

EXHIBIT 1

From: Olutayo Ariyo
Sent: Friday, May 29, 2020 1:18 PM
To: Elizabeth Spudich
Subject: Re: UPDATE ok AcLand Videos for Block 5 Dissection.

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks for your patience Liz.
It is my first experience at this, but I am learning. Should get this much tidier over the weekend.
Thanks
Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Friday, May 29, 2020 11:59 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Subject: Re: UPDATE ok AcLand Videos for Block 5 Dissection.
Thanks Tayo

a couple of things still need to be done

This document still does not have active links, it is still just a list of video titles.
If you look at the document I sent as an example all the titles are hyperlinked so that when you CTRL+ click on the words the video opens up. That is what I need to happen here. I need to be able to put my cursory on a specific title, hit CTRL+click and have the video pop open.

Also you lost the organization from the original version. This is just a random list and not aligned with our dissection flow

So you'll need to go back and look at the Block 5 dissection documents I sent earlier.

- First align the videos to a dissection session. You may have to use the same video in different session.
- Then place them in an order similar to how we would have proceeded through dissections
- Once the list is in place create the hyperlinks

It doesn't look like the anal triangle is represented in the videos so I would use that first block 5 dissection to collect all the bone and ligament videos and the pelvic diaphragm muscles viewed from below.

The spermatic cord videos are in the trunk series and it might do the students good to review the inguinal canal here, too. So you might think of adding that video to the mix.

The embryo video I was remembering might not be on its own.... It might be part of the inguinal videos in the trunk series. Or I might have dreamed it.

You keep working on this and how about we shoot to have the next version by Monday June 1 at 12 noon.

Thanks and have a good weekend!

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Friday, May 29, 2020 10:56 AM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Subject: UPDATE ok AcLand Videos for Block 5 Dissection.
Hello Liz,

These are the updates on Block 5 dissection selected from AC Land Video series.

I could not get appropriate images for the anal triangle; and for the embryos: please let me have your comments on this.

Thanks,

Tayo

EXHIBIT 2

From: Sue Menko
Sent: Wednesday, July 22, 2020 8:50 AM
To: Olutayo Ariyo
Cc: Elizabeth Spudich
Subject: IMPORANT MESAAGE - ANATOMY DISSECTION TEACHING

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Tayo,

I thank you for your willingness to teach in person dissecting for the Anatomy course despite the continued presence of COVID-19. However, as we were all informed yesterday, Jefferson has made the decision that dissection labs will be delivered in a virtual form. It was now imperative for me to know that all faculty have spent these past 4 months mastering the technologies for virtual course delivery so that our students are provided with the best teaching possible in this format.

In my conversations with Liz as to our faculty's preparedness to teach dissection virtually, and based on your e-mail responses yesterday, there are concerns with your own perceived skill level with these technologies and applications. **In response, we need to devise a plan to bring you to a high level of competence for teaching the medical students in this modality.** It is important that you read this entire e-mail and respond to me as soon as possible today. Please be aware that this is no longer a conversation about how we will be delivering this course, that decision has been made, and instead focus on the responses that I request, specifically, below. I'm certain that this is very important to you, as to all faculty. If you have issues outside of developing a high skill level with the required technologies/applications, I will shortly be scheduling the yearly faculty evaluations in which I am happy to discuss all your concerns.

I am aware that in response to Liz's important question in her recent e-mail: "If anyone feels they can't handle the plan as put forth, on their own, I need to know RIGHT NOW. We don't have a lot of time", that you responded "I have never done this before", followed by "Please have the assurance from me to do what it takes to bring me to a level of digital competency in the era of going virtual instead of face to face methodology in teaching Anatomy. With no previous demonstration however, I can not assure you of a 100 % effectiveness and efficiency next week."

This raised concerns as to why you are in this situation when Liz has made all the Anatomy faculty aware since March of the importance of spending their time working remotely developing the required skills with technology. Even if we were teaching dissection in person the classes would need to be augmented with these modalities. She also provided links since March to great webinars to help our faculty in Anatomy teaching in the world of COVID-19. I have been copied on all of them. The most important, to which I now bring your attention, were sent on March 27th and May 13th. I include crucial content from these below that indicate the skills we expected everyone to develop. **If you have not yet mastered these, you need to gain these skills this week.** Please be aware that there is no time for discussion about this now, only for the work required for you to gain the skills that are essential for you to teach dissection starting next week.

Liz's e-mail of May 13th stated: "By now most of you should have been contacted by representatives from Visible Body. You should have/or will be receiving information to activate your accounts and requests to schedule training sessions. Everyone must participate in training. It is absolutely VITAL that all the full-time anatomy faculty become familiar with the platform." **If you have not yet been**

trained in Visible Body then you need to contact them today, explain that you need to learn as much as possible before the course starts next week. Let us know by the end of the day the schedule for learning Visible Body. If you were trained by their representative and need further instruction you must schedule that now and let us know the plan.

In that same e-mail message Liz wrote: "Even if we are allowed to return to the labs in the Fall we have to be prepared to deliver the "experience" of anatomy virtually should some students not be able to attend classes in person due to health restrictions. In addition every effort is being made to plan for reduce in-person contact and employ social distancing guidelines for the foreseeable future. This means live streaming lectures on Zoom or Collaborate, Remote TBLs with breakout rooms and virtual office hours. Echoing what I wrote in email at the start of the pandemic all of you should be getting up to speed on the various educational technologies commonly used across the university and in JeffMD: Zoom, Canvas, Collaborate, Nearpod... and now Visible Body."

Therefore, it is also essential that you have a high comfort level with using Zoom, Canvas, Collaborate, Nearpod as well as Visible Body.

In Liz's March she provided this information that included links for learning these applications. Here is this content from that message:

"Canvas Workshops: We are moving to a new LMS in July. Blackboard is going away and we need to be facile in this new system. We have NO CHOICE with this

<http://library.jefferson.edu/tech/training-1.cfm>

Nearpod Practice and help: Nearpod is a great teaching tool in both real time and remotely. The students love it. We have a group account and this would be a great time for us to practice and increase our skill set with this platform. You can make you own folders and start creating your own sessions. Info for our group account is:

Login: skmcma2015@gmail.com

Password: microtome

For those of you who have the Articulate software you should know that they have TONS of excellent tutorials on how to get the most out of that software. I also want us to continue to get better using cloud based collaboration tools like Zoom, Office 365, Box. This is our new normal and we have to get up to speed."

Liz also pointed out in that e-mail that JeffHUB has a number of tutorials using Microsoft Office Products: Word, Excel and Outlook. You can get there through PeopleSoft.

Again, we need to know your skill level right now with Canvas, Zoom, Collaborate and Nearpod. I am assuming that you already have the required skill level in Office and Box. For any of these applications that you do not have a strong skill level in, they need to be developed through courses this week. If the library doesn't have scheduled sections you need to contact them immediately for personal online tutorials, via Zoom, to get you those skills. Please let them know the urgency of the situation. You are already aware how much the staff there are willing to help you.

I expect to hear back shortly about what applications you already have a strong skill level with. **For those in which you need training or a refresher I am asking you to provide us with your training schedule for this week and next, and to identify who is providing this training. These are all essential for teaching our students dissection.**

Best,

Sue

EXHIBIT 3

From: Sue Menko
Sent: Sunday, October 18, 2020 2:26 PM
To: Olutayo Ariyo; Elizabeth Spudich
Cc: Stephen Peiper
Subject: Re: Updating on Dissection Modules

Follow Up Flag: Follow up
Flag Status: Flagged

Tayo,

I have been informed that IS&T evaluated your computer and found nothing wrong. In reading over your message, it points to issues with using software. IS&T will not be able to help you with your e-mail issues. I advise when sending important messages that you immediately check your sent file. If it doesn't appear there, then you likely had an issue with sending, as happens to all of us. That will give you the opportunity to send again and troubleshoot issues.

Issues with PowerPoint are unlikely a problem with your computer but with using the software application. As I have directed you before, instruction in the use of software modalities like PowerPoint for teaching is covered by services provided through the library. I would begin with contacts provided with the following link, let them know the issues you are having, and let me know the steps that you decide to take with them to better handle PowerPoint presentations.
<https://www.jefferson.edu/university/academic-commons/office-professional-writing.html>

Some of these issues could also be addressed by the instruction provided to you through the library for online teaching. You should feel comfortable asking for help through these contacts and, if appropriate, they will redirect you to the correct learning resource.

In the meantime, I'd appreciate if you could update me on the status of your online training with Julie Phillips, the Assistant Director of the Academic Commons. I'm quite certain that if you master these resources, the computer software issues you are having with the teaching modalities will disappear.

Best,
Sue

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Sunday, October 18, 2020 2:07 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Updating on Dissection Modules

Hi Liz,,

I was on this when more premium and urgency were placed on the Lower limb and Upper limb dissections and in teaching the students.

At this time, I will be requesting for a new computer

Wednesday last week, I had completed the pictorial teaching modules for the lower limb and had attempted e- mailing to the Chair, Vice Chair and yourself, only to find this was only saved as a draft only. It failed to transmit. . I called IS&T and was scheduled to talk with Bryan Kennedy, but Unfortunately , could not get this done before Ryan proceeded on a vacation on Friday. Bryan promised he would hand this over for someone who would reach out to me. to get back

On Friday, I encountered another problem with the computer. As soon as I clicked to run PowerPoint images. a click on any image was followed by a rightward migration of the images , resulting in images completely disappearing from the slide!!!!

IS&T failed to even remote my computer and another Ticket had been opened. These images were annotated images I had prepared. So sad.

Never Before had I witnessed such.

I have annotated the images to upper and lower limb dissected anatomical structures and my plan was to make these available to the whole Class to assist in their reviews, and added value right now and having successfully done this, go back to complete those of the Perineum whose need might not be of much importance in terms of need until later.

I hope I can get someone from IS &T to come in tomorrow to help resolve so that I am able to send these out to you all.

Meanwhile, I am respectfully requesting for a new computer.. The one I currently have is too much of a headache, very frustrating and a great hindrance to a streamline execution and forwarding my efforts as at when due

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Friday, October 16, 2020 11:42 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Updating on Dissection Modules

Tayo

Do you have an update on the status of the male urogenital triangle dissections and materials you agreed to generate on 8/21/2020?

That was the project you had agreed to work on first.

Liz-

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Wednesday, October 14, 2020 11:05 PM

To: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: Re: Updating on Dissection Modules

From: Olutayo Ariyo <oga101@jefferson.edu>

Date: Wednesday, October 14, 2020 at 10:25 PM

To: Stephen Peiper <Stephen.Peiper@jefferson.edu>, Sue Menko <Sue.Menko@jefferson.edu>, Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: RE: Updating on Dissection Modules

Dear All.

I am just reporting back to share with you some progress made towards my intended plan to making dissecting modules that cover all areas of the Human Gross Anatomy that we teach to our SKMC Students.

What I am sharing so far is a DRAFT of this in the anterior thigh compartment as an illustration template pattern to other regions.

What is sent on the anterior thigh is not totally exhaustive- still has room for a few more slides in functional anatomy and additional slide illustrations (e.g. Cutaneous Innervation).

The photographs I do take along as I go (using my cell phone).

My forwarding this is to give a birds eye view of what this project will eventually look like

1. Anatomic dissection Images
2. Annotation of structures
3. Discuss some vital anatomical landmarks.
4. Clinical Notes.

The ones to cover Posterior thigh, Anterior leg and dorsum of foot plus Post. Leg and the Muscular layers of the foot will soon follow and later those for the upper limb..

I look forward to your comments, critics, suggestions and what I can add to give more value to this project.

I thank the Department for allowing me to do this.

Tayo.

EXHIBIT 4

DOCUMENT 32 : RETIREMENT LETTER

From,
Olutayo Ariyo
1016 Yeadon Avenue
Yeadon PA. 19050
09/15/2021

TO,
Professor Stephen Peiper,
Chair,
Pathology, Anatomy and Cell Biology
Thomas Jefferson University
1020 Locust Street
Philadelphia Pa. 19107.

Dear Professor Peiper,
This letter is my official notification to you, the Department
and to Thomas Jefferson University
that my last day at Thomas Jefferson will be June,30,
2022. On that day I plan to retire.
I would like to take this opportunity to thank the
Department and the University for all the
opportunities made available to me to have served.
Sincerely
Olutayo Ariyo MBBS., MBA.
Clinical Assistant Professor in Anatomy

EXHIBIT 5

From: Guiyun Zhang
Sent: Monday, June 13, 2022 10:32 AM
To: Olutayo Ariyo
Cc: Bruce Fenderson; Elizabeth Spudich; Sue Menko
Subject: Hope all is well.

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Tayo,

You and Dr. Fenderson are scheduled in the dissection lab today beginning at 9am, but you did not show up and Bruce is upset.

Are you ok? I hope everything is fine.

Kind regards,
Guiyun

Guiyun Zhang, MD, PhD
Associate Professor,
Department of Pathology, Anatomy & Cell Biology
Sidney Kimmel Medical College
Thomas Jefferson University
Philadelphia, PA 19107

EXHIBIT 6

Privileged

From: Sharonlee Hughes <Sharonlee.Hughes@jefferson.edu>
Date: Thursday, September 16, 2021 at 8:43 AM
To: Karen Novielli <Karen.Novielli@jefferson.edu>
Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Subject: RE: RETIREMENT LETTER AND NOTICE.

Yes – we'll take care of it.

Sharonlee

Sharonlee Hughes
Executive Assistant to:
Stephen C. Peiper, MD
Peter A. Herbut Professor & Chair
Department of Pathology, Anatomy and Cell Biology
Thomas Jefferson University
1020 Locust Street, Rm. 279
Philadelphia, PA 19107
T (215) 955-5057

From: Karen Novielli <Karen.Novielli@jefferson.edu>
Sent: Wednesday, September 15, 2021 10:30 PM
To: Sharonlee Hughes <Sharonlee.Hughes@jefferson.edu>
Cc: Margaret Ryan-Atkinson <Margaret.Ryan-Atkinson@jefferson.edu>
Subject: Re: RETIREMENT LETTER AND NOTICE.

Thanks Sharonlee. Can I assume you'll handle vis a vis HR?
Karen

From: Sharonlee Hughes <Sharonlee.Hughes@jefferson.edu>
Date: Wednesday, September 15, 2021 at 2:52 PM
To: Karen Novielli <Karen.Novielli@jefferson.edu>
Cc: Margaret Ryan-Atkinson <Margaret.Ryan-Atkinson@jefferson.edu>
Subject: FW: RETIREMENT LETTER AND NOTICE.

Dear Dr Novielli,

Please see attached.

Sharonlee

Sharonlee Hughes
Assistant to the Chair
Department of Pathology, Anatomy and Cell Biology
Thomas Jefferson University
1020 Locust Street, Rm. 279
Philadelphia, PA 19107
T (215) 955-5057

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Wednesday, September 15, 2021 2:42 PM
To: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Subject: RE: RETIREMENT LETTER AND NOTICE.

Dear Prof. Peiper,
Please find attached my official notice of an intent to retire June 30th, 2022.
I thank you so much for all the support and I wish the Department well.
Respectfully,
Tayo.

EXHIBIT 7

From: Sue Menko
Sent: Tuesday, July 21, 2020 11:00 PM
To: Elizabeth Spudich
Subject: Re: Visible Body app and software

Follow Up Flag: Follow up
Flag Status: Flagged

Great. This is very specific. I would like to speak with you tomorrow Liz - I will do my best to work around your schedule If you could let me know what works best for you.

Sent from my iPhone

On Jul 21, 2020, at 10:55 PM, Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu> wrote:

Here is the may 13 email

It is pretty explicit in the platforms needed

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Wednesday, May 13, 2020 10:52 AM
To: Richard R. Schmidt <Richard.Schmidt@jefferson.edu>; Paul Howard <Paul.Howard@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Visible Body app and software

Good morning
By now most of you should have been contacted by representatives from Visible Body.

You should have/or will be receiving information to activate your accounts and requests to schedule training sessions.

Everyone must participate in training.

It is absolutely VITAL that all the full-time anatomy faculty become familiar with the platform.

Even if we are allowed to return to the labs in the Fall we have to be prepared to deliver the "experience" of anatomy virtually should some students not be able to attend classes in person due to health restrictions. In addition every effort is being made to plan for reduce in -person contact and employ social distancing guidelines for the foreseeable future. This means live streaming lectures on Zoom or Collaborate, Remote TBLs with breakout rooms and virtual office hours

Echoing what I wrote in email at the start of the pandemic all of you should be getting up to speed on the various educational technologies commonly used across the university and in JeffMD: Zoom, Canvas, Collaborate, Nearpod... and now Visible Body.

Things are changing and we will be using technology to advance the curriculum. It is our job to be ready for it.

Liz-

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

EXHIBIT 8

From: Elizabeth Spudich
Sent: Wednesday, July 22, 2020 6:55 AM
To: Sue Menko
Subject: Fw: Faculty Development Resources in the Time of Covid-19

Follow Up Flag: Follow up
Flag Status: Flagged

Below is an email I received from Tayo after the first alert to technology training was sent out in March.

I have no record of his ever reading the May email, though I know it was delivered, as I asked for both types of receipts.

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Friday, March 27, 2020 12:04 PM
To: Paul Howard <Paul.Howard@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Daniel F Jones <Daniel.Jones@jefferson.edu>; daniel.jones.md@gmail.com <daniel.jones.md@gmail.com>; Gary Lindenbaum <Gary.Lindenbaum@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Philip Marcucci <Philip.Marcucci@jefferson.edu>; Richard R. Schmidt <Richard.Schmidt@jefferson.edu>; richard schmidt <schmidt705@gmail.com>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Faculty Development Resources in the Time of Covid-19

Thanks Liz and other contributors. For all the challenges there is the need for some of us (people like me) to attend formal training sessions as far as massive technological paradigm shift isthat now demands flexibility and adaptability Will appreciate more of these helping Resources.

Meanwhile, will work more in refining review notes that have compacted helpful information in the various systems, share these with other Faculties .

Clinical notes will be added and some questions whose answers will be in an entirely module.

When we return, will request for 1or 2 bodies for dissection and making projections to cover

- 1.
- Infratemporal fossa
- 2.
- Layers of the foot
- 3.

Dissecting the Parotid gland area, voicing over these as a helping dissection guide to isolating the 5 terminal branches of the Facial nerve.

I have chosen 1 and 2 to work on as I had observed dissections of these areas are excluded, possibly as a result of time factors. Such prosecutions I do hope will eventually rise up to a prosecution /quadrant, especially seeking out human gifts that may be not dissected in these regions at the end of their final dissection sessions (in the 2nd year) before these gifts are moved away.

Home alone, isolated day to day is stressful,. Helpful resources are therefore highly welcome and appreciated. It is such a time to value what each of us contributed to that sanity in ourselves we took for granted.

Thanks all.

Tayo Ariyo

From: Paul Howard <Paul.Howard@jefferson.edu>

Sent: Friday, March 27, 2020 11:13 AM

To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Daniel F Jones <Daniel.Jones@jefferson.edu>; daniel.jones.md@gmail.com <daniel.jones.md@gmail.com>; Gary Lindenbaum <Gary.Lindenbaum@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>; Philip Marcucci <Philip.Marcucci@jefferson.edu>; Richard R. Schmidt <Richard.Schmidt@jefferson.edu>; richard schmidt <schmidtr705@gmail.com>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Faculty Development Resources in the Time of Covid-19

Hello Everyone!

Yes, very unusual times.

Liz, thanks for the resources below. Yes, this is a great time to come up to speed on those products. Do you know if Articulate is available to those of us that don't have the software?

I have done the Zoom and Collaborate trainings and they were both excellent.

Hang in there everyone,
Paul

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Friday, March 27, 2020 8:55 AM

To: Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Daniel F Jones <Daniel.Jones@jefferson.edu>; daniel.jones.md@gmail.com <daniel.jones.md@gmail.com>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Gary Lindenbaum <Gary.Lindenbaum@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>; Paul Howard <Paul.Howard@jefferson.edu>; Philip Marcucci <Philip.Marcucci@jefferson.edu>; Richard R. Schmidt <Richard.Schmidt@jefferson.edu>; richard schmidt <schmidtr705@gmail.com>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Faculty Development Resources in the Time of Covid-19

Good Morning

These are crazy times! We are home bound and without student contact for the foreseeable future.

There would have been a lot of teaching over the next few weeks for us in JeffMD with Lectures, dissections, Labs, TBLs, Practical exams and student mentoring.

In order to keep us from getting bored or losing our teaching edge (or harming those quarantined with us) I put together a list of things we can do along with some Faculty development resources that we should all explore over the coming weeks.

When we all get back in the game I want us to be sharp, ready to go and better than we were when this all started!

JeffHUB has a number of tutorials using Microsoft Office Products: Word, Excel and Outlook. You can get there through PeopleSoft

Faculty development modules (current, Archived and Magna Learning Commons

<http://library.jefferson.edu/tech/training-6.cfm>

Canvas Workshops: We are moving to a new LMS in July. Blackboard is going away and we need to be facile in this new system. We have NO CHOICE with this

<http://library.jefferson.edu/tech/training-1.cfm>

Nearpod Practice and help: Nearpod is a great teaching tool in both real time and remotely. The students love it. We have a group account and this would be a great time for us to practice and increase our skill set with this platform. You can make you own folders and start creating your own sessions. Info for our group account is:

Login: skmcma2015@gmail.com

Password: microtome

For those of you who have the Articulate software you should know that they have TONS of excellent tutorials on how to get the most out of that software.

I also want us to continue to get better using cloud based collaboration tools like Zoom, Office 365, Box. This is our new normal and we have to get up to speed.

Stay Busy, Stay Sane and Stay **Safe**

Liz-

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

EXHIBIT 9

Privileged

From: Steven Herrine <Steven.Herrine@jefferson.edu>
Date: Thursday, March 31, 2022 at 8:15 AM
To: Karen Novielli <Karen.Novielli@jefferson.edu>
Subject: FW: An Interest In Phased Retirement Program (Human Gross Anatomy Education).).

FYI.
-Steve

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Date: Wednesday, March 30, 2022 at 9:16 PM
To: Steven Herrine <Steven.Herrine@jefferson.edu>
Subject: Re: An Interest In Phased Retirement Program (Human Gross Anatomy Education).).

Dear Dr. Herrine,
Thank you so much for getting back with me. I do understand and appreciate the thoughtfulness. Good luck to You and your Team in the search for a competent replacement Faculty .
Sincerely,
Olutayo Ariyo MBBS., MBA.

From: Steven Herrine <Steven.Herrine@jefferson.edu>
Sent: Monday, March 28, 2022 12:47 PM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Subject: Re: An Interest In Phased Retirement Program (Human Gross Anatomy Education).).

Dear Dr. Ariyo:

Your letter of retirement was accepted and the option for phased retirement is no longer available, as we have already started the process of replacing this position. I am sorry that I cannot offer you this option.

Sincerely,

Steven K. Herrine, MD
Professor of Medicine
Vice Dean, Academic Affairs/UME
Sidney Kimmel Medical College
Thomas Jefferson University
he/him

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Date: Monday, March 21, 2022 at 2:08 PM
To: Steven Herrine <Steven.Herrine@jefferson.edu>
Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Subject: RE: An Interest In Phased Retirement Program (Human Gross Anatomy Education).).

Dear Dr. Herrine,

My name is Olutayo Ariyo, Clinical Assistant Professor, Pathology, Anatomy and Cell Biology.

My tentative retirement date from the services of Thomas Jefferson University is slated for 06/30/2022.

Shortly before I made an overseas trip recently, I contacted the Chair of Anatomy, Prof. Peiper of my interest in the "Phased Retirement " program, 2022-2024 Academic Sessions if possible. I am interested in the teaching of Gross Anatomy to the Medical Students, giving more of my expertise in Clinical Anatomy. as an added value.

Prof. Peiper had counselled that I reach out to you on this. Please find attached a copy of my CV and a synopsis on my contributions to teaching Human Gross Anatomy in general.

I look forward to hearing from you soon

Thanks,

Sincerely,

Olutayo Ariyo MBBS., MBA.

(610) 931-7383.

From: Olutayo Ariyo
Sent: Friday, March 4, 2022 11:59 PM
To: tmajor33@hotmail.com <tmajor33@hotmail.com>
Subject: To Dr. H

EXHIBIT 10

From: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Date: Thursday, September 9, 2021 at 6:35 PM
To: Karen Novielli <Karen.Novielli@jefferson.edu>
Subject: Re: Retiring JUNE 2022.

Dear Dr Novielli,
I will write to him as you have instructed
Sincerely,
SP

Sent from Workspace ONE Boxer

On Sep 9, 2021 4:04 PM, Karen Novielli <Karen.Novielli@jefferson.edu> wrote:
Steve,
Can you respond to Dr. Ariyo and ask him to let you know in writing of his retirement plans as soon as he is certain of a date? That this is important information in order to plan for the course for next year.
Thanks.
Karen

From: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Date: Thursday, September 9, 2021 at 9:51 AM
To: Karen Novielli <Karen.Novielli@jefferson.edu>
Subject: FW: Retiring JUNE 2022.

Dear Dr Novielli,
As per your request, I am forwarding Dr Ariyo's email discussing retirement.
SP

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Date: Tuesday, August 31, 2021 at 8:44 PM
To: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Subject: Retiring JUNE 2022.

Dear Prof. Peiper,

I have been so lucky in life crossing path with you. If anything, you made me fulfilled. My academic life and Career were crumbling and almost halting when you came in and made the difference. I owe you eternal gratitude. for these. Grateful for the support, encouragement and the provision and support for a vibrant

enabling workplace that is friendly and highly supportive of Scholarship. In the about 8 years I became a Faculty, I have authored about 19 Manuscripts, all of them 1st Author and sole author in about 15 of these. This is an informal and personal letter to inform you that I hope to retire in June 2022, at the end of this 21,22 Academic Year.

You made me accomplished. You did. And will never, ever forget this.

You are that Angel sent my way and in the past 8 years the wind beneath that wing that brought succor, joy and fulfilment. Your Administration had brought significant growth, empowerment, the human touch and those exemplary interpersonal human skills - the bedrock and hallmark of high performance in all endeavors in life. Would definitely shed tears - tears of joy for what you made me accomplish and in particular for missing you, though I promise to continue to stay and get in touch.

Wish there was a way to quantify and qualify such an immense thanks that you so much deserve.

Love and gratitude from my entire family members and to your lovely wife too.

Respectfully and thankfully.

Tayo.

EXHIBIT 11

Privileged

From: Karen Novielli <Karen.Novielli@jefferson.edu>
Date: Thursday, September 9, 2021 at 4:31 AM
To: Sue Menko <Sue.Menko@jefferson.edu>, Stephen Peiper <Stephen.Peiper@jefferson.edu>
Cc: Steven Herrine <Steven.Herrine@jefferson.edu>, Sharonlee Hughes <Sharonlee.Hughes@jefferson.edu>
Subject: Re: Pending resignation

Can you please forward me the e-mail? Thanks.

From: Sue Menko <Sue.Menko@jefferson.edu>
Date: Tuesday, September 7, 2021 at 8:04 AM
To: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Cc: Steven Herrine <Steven.Herrine@jefferson.edu>, Karen Novielli <Karen.Novielli@jefferson.edu>, Sharonlee Hughes <Sharonlee.Hughes@jefferson.edu>
Subject: Re: Pending resignation

Dear Steve,

Thank you for informing me. Tayo has not informed me of his intention to resign. With Bruce Fenderson retiring, or taking phased retirement, it becomes essential to address how we will provide the teaching staff required for the courses we cover sooner than later.

Sue

From: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Date: Tuesday, September 7, 2021 at 6:55 AM
To: Sue Menko <Sue.Menko@jefferson.edu>
Cc: Steven Herrine <Steven.Herrine@jefferson.edu>, Karen Novielli <Karen.Novielli@jefferson.edu>, Sharonlee Hughes <Sharonlee.Hughes@jefferson.edu>
Subject: Pending resignation

Dear Sue *et al*,

Last week I received an email from Dr Ariyo stating that he intends to retire at the end of this academic year (June 2022). It was a personal email that thanked the Department for supporting his academic activities. I do not know whether it can be considered a formal letter of resignation.

Sincerely,

SP

--

Stephen C. Peiper, MD

Peter A. Herbut, MD Professor and Chair, Department of Pathology, Anatomy & Cell Biology

Sidney Kimmel Medical College, Thomas Jefferson University

Senior Vice President for Pathology & Laboratory Medicine Service Line

Jefferson Health

EXHIBIT 12

From: Elizabeth Spudich
Sent: Wednesday, July 6, 2022 4:48 PM
To: Renee Anderson
Subject: Fw: Dell Latitude 5590 (15") Laptop received

Follow Up Flag: Follow up
Flag Status: Flagged

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Chief, Anatomy Education Division
Department of Medical Education
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Tuesday, February 9, 2021 9:54 AM
To: Sue Menko <Sue.Menko@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Steven Gudowski <Steven.Gudowski@jefferson.edu>; Renee Anderson <Renee.Anderson@jefferson.edu>; Mark Ross <Mark.Ross@jefferson.edu>
Subject: Dell Latitude 5590 (15") Laptop received

Dear. Dr. Menko,

This is to acknowledge the receipt of Dell Latitude 5590 (15") Laptop from IST shipped to my home address by one of their Staff ,Mr.Mark Ross.

I am grateful to the Department for this and a proof of providing a Staff friendly working and scholarship environment. Ditto, the much coordinating roles between Steve, Mark and Renee in effecting and getting this done.

Thank you all.

Tayo.

EXHIBIT 13



Office of the Provost

Center City Campus
1020 Walnut Street, Suite 643
Philadelphia, PA 19107

East Falls Campus
4201 Henry Avenue
Philadelphia, PA 19144

June 20, 2018

Olutayo Ariyo, MBBS
Sidney Kimmel Medical College
Department of Pathology, Anatomy and Cell Biology

Dear Doctor Ariyo:

I am pleased to inform you that, on June 19, 2018, the Thomas Jefferson University Board of Trustees approved your promotion to the faculty of Sidney Kimmel Medical College of Thomas Jefferson University (SKMC) from Clinical Instructor of Pathology, Anatomy and Cell Biology, fully-salaried, non-tenured to Clinical Assistant Professor of Pathology, Anatomy and Cell Biology, fully-salaried, non-tenured, effective June 19, 2018.

The privileges and responsibilities of faculty appointment are described in the SKMC Bylaws which can be found at: <http://www.jefferson.edu/university/skmc/faculty/faculty-affairs/governance-advocacy/senate-committees.html>

Additionally, as a faculty member of SKMC, it is important that you familiarize yourself with the responsibilities of educating our medical students. To this end, you should review the SKMC faculty handbook (<http://www.jefferson.edu/university/skmc/faculty/faculty-affairs/governance-advocacy/policies-guidelines.html>) which, among other useful information, outlines the SKMC competencies which govern the medical school curriculum, and the SKMC policy for the clinical supervision of medical students, which describes faculty responsibilities regarding the learning environment.

In the event that your employment is terminated, please be advised that your faculty appointment will also terminate.

Sidney Kimmel Medical College of Thomas Jefferson University is committed to providing excellence in medical education, patient care, and research. This commitment to excellence begins with the SKMC faculty on whom the success of our organization is dependent. I look forward to partnering with you as you begin your journey of excellence as a Jefferson faculty member. In this spirit I welcome you to the faculty!

Sincerely,

A handwritten signature in blue ink that reads 'Mark Tykocinski'.

Mark L. Tykocinski, M.D.
Provost and Executive Vice President for Academic Affairs, Thomas Jefferson University
The Anthony F. and Gertrude M. DePalma Dean
Sidney Kimmel Medical College at Thomas Jefferson University

cc: Stephen Peiper, M.D.
Sharonlee Hughes
Christine McGonigal

EXHIBIT 14

From: Elizabeth Spudich
Sent: Wednesday, July 29, 2020 2:55 PM
To: Sue Menko; Steven Herrine; Deborah Ziring
Subject: Anatomy faculty competency concerns in JeffMD
Attachments: Competencies Needed for delivery of Anatomy Thread materials in a Digital curriculum.docx

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

Over the past 2 weeks I have observed everyone involved with the JeffMD Anatomy Thread with respect to their ability to manage the delivery of the curriculum using current digital technologies. Right now, Dr. Olutayo Ariyo has not been able to demonstrate the required level of skill in these platforms. As such, Dr. Ariyo will not be included in the delivery of the digital anatomy curriculum until he demonstrates the same levels of competency required of all the teaching faculty. (I have attached a document outlining all the skills each of the faculty were recently required to demonstrate.)

Having monitored his performance in practice/training sessions, provided by myself and Dr. Jeff Baliff, and during the first histology sessions this week with students, it is unclear what, exactly, is hampering his ability to demonstrate proficiency. He has reported computer issues in each of these session (both on home and on work computers). So there may be a hardware/connectivity problem that needs to be addressed.

It may be training. All faculty were instructed to avail themselves of training provided by the university in Canvas, Collaborate, Nearpod, Zoom, etc. These instructions were put forth, by me, in March, when we first went all digital. They were reiterated in May when the Visible Body platform came online. At this time, instructors were told of our need to be able to deliver the entire JeffMD Anatomy Curriculum in all formats: in-person, digital or a hybrid. I am not aware of what training sessions Dr. Ariyo may have participated in over the summer. My recent observations indicate he is not yet at a level where I can include him as an instructor in any Collaborate classrooms for histology or dissection. He may require additional levels of training time that go beyond the support myself or his colleagues can provide.

Dr. Menko, as his direct manager, it is most appropriate for you to communicate this decision to him as soon as possible, to work with him to ascertain the exact nature (hardware, training, etc) of why he has been unable to

effectively demonstrate these skills, and to develop and communicate an appropriate timeline for the resolution of these issues. Once you and Dr. Ariyo believe they have been sufficiently resolved, his proficiency in the skills included on the attached list can be reexamined.

Sincerely,
Liz-

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

EXHIBIT 15

From: Sue Menko
Sent: Wednesday, September 9, 2020 8:48 AM
To: Elizabeth Spudich; Olutayo Ariyo
Subject: Re: Updated Clinical Anatomy Review Questions and Answers : Dissection 1.

Follow Up Flag: Follow up
Flag Status: Flagged

Tayo - It is important for the course that you address Liz's questions and direction in your revisions.

Sue

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Wednesday, September 9, 2020 7:37 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Updated Clinical Anatomy Review Questions and Answers : Dissection 1.
Tayo

thank you for this latest draft of the block 1 questions. Block one is over now but we can still work on these for use next year.

I am concerned that most of my previous suggestions from the last version were not addressed in this draft nor was there an explanation as to why they weren't addressed.

Please review the attached document and review both the new comments and the older suggested edits

Thanks
Liz-

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Tuesday, September 8, 2020 9:56 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Updated Clinical Anatomy Review Questions and Answers : Dissection 1.

Hi Liz,

Please find attached a revised and updated Clinical Anatomy Questions and Answers for Dissection 1 Block.

Thanks.

Tayo.

EXHIBIT 16

From: Olutayo Ariyo
Sent: Monday, September 14, 2020 1:30 PM
To: Elizabeth Spudich
Cc: Sue Menko
Subject: Re: Dissection Plans

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Liz,
I hope these is not a mix up. My dissection was carried out in the Room on the left entering from the Blue Wall Arcade. If any mix-up, my mistake, but there is no way and no reason to claim I came in doing some work if I did not. Was there also on Friday too working on the body I am carrying out total prosection on in RM3. This can also be verified before I come in later in the day.
.Thanks.
Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Monday, September 14, 2020 12:48 PM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Dissection Plans

Tayo
When were you here on Saturday and how long did you dissect?

I just looked at the all bodies in that were in Room 2 over the weekend and I cannot see any fresh dissections on them past what the students completed in Block 3.

The only fresh dissection I saw was on your video Project body in room 3

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Monday, September 14, 2020 12:34 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Dissection Plans

Hi Liz,

I spent my Saturday virtually in the dissecting Room 2. I had earlier communicated this to you that I was going to be in Room 2 since you already started dissecting the extensor compartment in Rm 3. I went to RM 2, started on dissecting body in the Supine position. My understanding from your earlier note was that the bodies in Rm. 3 had been split between Dr, Schmidt and yourself. I will be in school later today to continue on the dissection please.

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Monday, September 14, 2020 10:56 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Dissection Plans

Tayo

As I mentioned in an earlier email, your priority for dissection MUST be to complete the dissection of the limbs on the cadavers in the BLUE BAGS.

You made a commitment to me and to the medical college that you would assist in generating these prosections for the upcoming Block 6 in person sessions.

I am concerned, that despite your email on Friday stating you would work on the specimens in Room 2, none of those have been touched.

If your commitment to assisting in the generation of the prosections, as well as participating in the in-person instructional sessions, has changed please let me know as soon as possible so I might plan accordingly

Regards

Liz-

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

EXHIBIT 17

From: Elizabeth Spudich
Sent: Thursday, September 17, 2020 10:31 AM
To: Olutayo Ariyo; Sue Menko
Subject: Re: BLK 5 DISSECTION QUESTIONS AND ANSWERS.

Importance: High

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Tayo

I never received a final version of these review questions you were going to draft for Block 5.

This set of questions was due on Monday Sept 14, 2020 as outlined in the emails below. The Practical exam is this morning, so unfortunately, we will not be able to use them this year. If you wish to continue working on them, I will consider them for usage next year.

Liz-

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Friday, August 28, 2020 9:58 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: BLK 5 DISSECTION QUESTIONS AND ANSWERS.
Thanks Tayo,

There is still some work to be completed before we send these files out to the students.

Please see my comments on the two attached documents.

If possible please keep these comments in mind as you are preparing the Block 1 materials

Thanks

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Thursday, August 27, 2020 8:35 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: BLK 5 DISSECTION QUESTIONS AND ANSWERS.
Hi Liz.
BLK 1 Dissection QUESTIONS AND ANSWERS MAY ARRIVE LATE TOMORROW.
Thanks.
Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Friday, August 21, 2020 7:41 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Cc: Philip Marcucci <Philip.Marcucci@jefferson.edu>
Subject: Re: Issuesof Video Dissection Modules and Introduction of Oral/ Viva Sessions.
Tayo,

I am glad to hear you are open to any responsibilities.

Here is what the curriculum needs right now.

We need Block 1 review questions by **8/31/2020** - I would like you to generate 5-6 review questions covering the material in the Block 1 dissections. I have attached the Block 1 dissection documents so you can see which study questions they have already had. We don't want to repeat ourselves. They need to be clinically oriented with clear answers and explanations.

We need Block 5 review questions by **9/14/2020** - I would like you to generate 6-8 review questions for the material in Block 5. There should be some that cover structures in both sexes I have attached the Block 5 dissection documents so you can see which study questions they have already had. We don't want to repeat ourselves. They need to be clinically oriented with clear answers and explanations.

I would like you to start working on quality dissections for the Ischioanal fossa and one of the urogenital triangles. Would you prefer male or female? I will be in work next week and will work with Chris to get you set up in a room. Once those dissections are completed we will set up to film you reviewing the structures.

Elizabeth A. Spudich, PhD
Assistant Professor

Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Thursday, August 20, 2020 3:29 PM

To: Sue Menko <Sue.Menko@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: Re: Issuesof Video Dissection Modules and Introduction of Oral/ Viva Sessions.

Dear Dr. Menko,

I hope you received my response to Liz on welcoming any responsibilities towards active participation in the teaching of Gross Anatomy which I also shared with you.

The COVID-19 era certainly has woken everyone up to the possibility of a possible paradigm shift from face to face to Virtual teaching of Anatomy (which I pray is not made permanent).

Prosection modules using a fresh cadaver will optimize clearer teaching dissected specimens.

introduction and brief clinical teaching I hope to incorporate I see as value- added flavor to give Anatomy a holistic integrated approach.

I will start adding more questions to preparing oral/viva questions as contributory to a Bank of contributions from other Faculty members as added resources for teaching. .

I do appreciate your concern, interest and encouragement.

Thanks.

Tayo.

From: Sue Menko <Sue.Menko@jefferson.edu>

Sent: Thursday, August 20, 2020 8:22 AM

To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Subject: Re: Issuesof Video Dissection Modules and Introduction of Oral/ Viva Sessions.

Hi Tayo,

It sounds to me like Liz has come up with some important ways that you can contribute effectively to Anatomy teaching right now. I encourage you to follow her suggestions.

Sue

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Thursday, August 20, 2020 6:32 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Issuesof Video Dissection Modules and Introduction of Oral/ Viva Sessions.

Tayo

As you know, in phase 1 we do not do the Orbit or the Infratemporal fossa dissections. Giving them video on that may confuse the student on what they are expected to know for the practical exam.

Those videos would not be needed until Phase 3. Dick is in charge of the Phase 3 Head and Neck elective. WE should check with him on his need for video supplementation in that elective.

We DO need videos for phase 1 on the ischioanal fossa and the male and female urogenital triangles

Concerning the review questions, I know the original plan was to have in person review sessions in the labs but original the idea was for you to generate a set of questions that could be used by **all** the faculty; since you can't be in all four rooms at once.

They would have had to be written down to be given to the other faculty, as would your expected answers. I'm not sure why that can't still happen in such a way that they can be given to the students as study resources.

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Wednesday, August 19, 2020 11:57 AM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Issues of Video Dissection Modules and Introduction of Oral/ Viva Sessions.
Hi Liz,

I was trying to make dissection videos encompassing the different regions we teach in Human Gross Anatomy, including those not covered recently- those of the orbit and the infratemporal fossa all to be voiced over,

As at the July 15th Meeting, we were still hoping for a face to face dissections, What I was advocating was setting the last dissection day of any region to quizzing the students on a one to one basis, These are oral or viva sessions, completely impromptu, individually moderated by each Faculty in their stylistic preferences. For instance I personally would have used the session to introduce clinical Anatomy as I can infer from some past student evaluation some perceive Clinical Anatomy as diversionary or tangentially off. This subset of students wish to get their dissection done with and be off.

The idea was to get students know they are coming in to be viva , with a goal of getting them individually prepared.

I am sorry if this advocated oral session may have been perceived differently. It is designed exclusively for a face to face encounter.

Thanks,
Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Monday, August 17, 2020 12:16 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: ANAT: Meet your Digital Dissector

These would be videos going through prosections, correct? Which regions were you thinking of working on? We don't have videos yet of the Ischioanal Fossa nor either of the perineum/urogenital triangles.

Also, at the end of our July 15th meeting you were going to work on a set of review questions for the upcoming Block 1 and Block 5 assessments.

Do you have a draft of those yet? It would be great if they were in PowerPoint or Nearpod so we could deliver them as self paced formative assessments.

Liz

Elizabeth A. Spudich, PhD

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Friday, August 14, 2020 3:25 PM

To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: Re: ANAT: Meet your Digital Dissector

Hi. Liz,

I was thinking this might be a good time for me to start on the dissection Module we can later share , in addition to those by Guiyun.

Do you think I can get a body for this?.

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Thursday, August 13, 2020 8:10 PM

To: Richard R. Schmidt <Richard.Schmidt@jefferson.edu>; Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Paul Howard <Paul.Howard@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Subject: ANAT: Meet your Digital Dissector

When: Friday, August 14, 2020 13:00-14:00.

Where: Blackboard Collaborate Guest Link: <https://us.bbcollab.com/guest/3e89e739a3884240a015659b0a634107>

<https://us.bbcollab.com/guest/3e89e739a3884240a015659b0a634107>

This is the Collaborate link for the Meet your Digital Dissector session

EXHIBIT 18

From: Elizabeth Spudich
Sent: Thursday, September 17, 2020 1:32 PM
To: Olutayo Ariyo; Sue Menko
Subject: Re: BLK 5 DISSECTION QUESTIONS AND ANSWERS.

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Tayo

The email concerning saving the questions for next year was specifically about the Block 1 questions. The original draft of Block 5 review questions I sent back to you on 8/31, predating any notion of these dissections.

If you can access your email from your home computer you should be able to download any files I sent to you by email and resave them to your university BOX account which is a cloud based storage system that is available to all faculty and also available anywhere there is internet access. If it is saved to the cloud you can work on things wherever you have access to wifi and a computer that works. This way, you don't need to be hampered by the speed at which the university handles IT requests.

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Thursday, September 17, 2020 12:16 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: BLK 5 DISSECTION QUESTIONS AND ANSWERS.

Hi Liz,

I thought an earlier e-mail suggested that both Dissections 1 and 5 documents were going to be used in 2021 and emphasis has to be placed on getting the dissections ready.

Again, I am still waiting to get my office computer fixed. I had previously indicated in past e-mail that I am unable to access my computer. Figs. 1 and 2 do not type up. I need fig. 1 to type up my Campus key, handicapping me from having access to my computer screen as to be able to transfer document into a disk and take this home for editing in the alternative.

I have sent information to Renee as to the state of my computer as requested.

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Thursday, September 17, 2020 10:31 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: BLK 5 DISSECTION QUESTIONS AND ANSWERS.
Tayo

I never received a final version of these review questions you were going to draft for Block 5.

This set of questions was due on Monday Sept 14, 2020 as outlined in the emails below. The Practical exam is this morning, so unfortunately, we will not be able to use them this year. If you wish to continue working on them, I will consider them for usage next year.

Liz-

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Friday, August 28, 2020 9:58 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: BLK 5 DISSECTION QUESTIONS AND ANSWERS.
Thanks Tayo,

There is still some work to be completed before we send these files out to the students.

Please see my comments on the two attached documents.

If possible please keep these comments in mind as you are preparing the Block 1 materials

Thanks

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Thursday, August 27, 2020 8:35 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: BLK 5 DISSECTION QUESTIONS AND ANSWERS.

Hi Liz.
BLK 1 Dissection QUESTIONS AND ANSWERS MAY ARRIVE LATE TOMORROW.
Thanks.
Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Friday, August 21, 2020 7:41 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Cc: Philip Marcucci <Philip.Marcucci@jefferson.edu>
Subject: Re: Issues of Video Dissection Modules and Introduction of Oral/ Viva Sessions.

Tayo,

I am glad to hear you are open to any responsibilities.

Here is what the curriculum needs right now.

We need Block 1 review questions by **8/31/2020** - I would like you to generate 5-6 review questions covering the material in the Block 1 dissections. I have attached the Block 1 dissection documents so you can see which study questions they have already had. We don't want to repeat ourselves. They need to be clinically oriented with clear answers and explanations.

We need Block 5 review questions by **9/14/2020** - I would like you to generate 6-8 review questions for the material in Block 5. There should be some that cover structures in both sexes I have attached the Block 5 dissection documents so you can see which study questions they have already had. We don't want to repeat ourselves. They need to be clinically oriented with clear answers and explanations.

I would like you to start working on quality dissections for the Ischioanal fossa and one of the urogenital triangles. Would you prefer male or female? I will be in work next week and will work with Chris to get you set up in a room. Once those dissections are completed we will set up to film you reviewing the structures.

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Thursday, August 20, 2020 3:29 PM

To: Sue Menko <Sue.Menko@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: Re: Issuesof Video Dissection Modules and Introduction of Oral/ Viva Sessions.

Dear Dr. Menko,

I hope you received my response to Liz on welcoming any responsibilities towards active participation in the teaching of Gross Anatomy which I also shared with you.

The COVID-19 era certainly has woken everyone up to the possibility of a possible paradigm shift from face to face to Virtual teaching of Anatomy (which I pray is not made permanent).

Prosection modules using a fresh cadaver will optimize clearer teaching dissected specimens.

introduction and brief clinical teaching I hope to incorporate I see as value- added flavor to give Anatomy a holistic integrated approach.

I will start adding more questions to preparing oral/viva questions as contributory to a Bank of contributions from other Faculty members as added resources for teaching. .

I do appreciate your concern, interest and encouragement.

Thanks.

Tayo.

From: Sue Menko <Sue.Menko@jefferson.edu>

Sent: Thursday, August 20, 2020 8:22 AM

To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Subject: Re: Issuesof Video Dissection Modules and Introduction of Oral/ Viva Sessions.

Hi Tayo,

It sounds to me like Liz has come up with some important ways that you can contribute effectively to Anatomy teaching right now. I encourage you to follow her suggestions.

Sue

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Thursday, August 20, 2020 6:32 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Issuesof Video Dissection Modules and Introduction of Oral/ Viva Sessions.

Tayo

As you know, in phase 1 we do not do the Orbit or the Infratemporal fossa dissections. Giving them video on that may confuse the student on what they are expected to know for the practical exam.

Those videos would not be needed until Phase 3. Dick is in charge of the Phase 3 Head and Neck elective. WE should check with him on his need for video supplementation in that elective.

We DO need videos for phase 1 on the ischioanal fossa and the male and female urogenital triangles

Concerning the review questions, I know the original plan was to have in person review sessions in the labs but original the idea was for you to generate a set of questions that could be used by **all** the faculty; since you can't be in all four rooms at once.

They would have had to be written down to be given to the other faculty, as would your expected answers. I'm not sure why that can't still happen in such a way that they can be given to the students as study resources.

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Wednesday, August 19, 2020 11:57 AM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Issues of Video Dissection Modules and Introduction of Oral/ Viva Sessions.
Hi Liz,

I was trying to make dissection videos encompassing the different regions we teach in Human Gross Anatomy, including those not covered recently- those of the orbit and the infratemporal fossa all to be voiced over,

As at the July 15th Meeting, we were still hoping for a face to face dissections, What I was advocating was setting the last dissection day of any region to quizzing the students on a one to one basis, These are oral or viva sessions, completely impromptu, individually moderated by each Faculty in their stylistic preferences. For instance I personally would have used the session to introduce clinical Anatomy as I can infer from some past student evaluation some perceive Clinical Anatomy as diversionary or tangentially off. This subset of students wish to get their dissection done with and be off.

The idea was to get students know they are coming in to be viva , with a goal of getting them individually prepared.

I am sorry if this advocated oral session may have been perceived differently. It is designed exclusively for a face to face encounter.

Thanks,
Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Monday, August 17, 2020 12:16 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: ANAT: Meet your Digital Dissector

These would be videos going through prosections, correct? Which regions were you thinking of working on? We don't have videos yet of the Ischioanal Fossa nor either of the perineum/urogenital triangles.

Also, at the end of our July 15th meeting you were going to work on a set of review questions for the upcoming Block 1 and Block 5 assessments.

Do you have a draft of those yet? It would be great if they were in PowerPoint or Nearpod so we could deliver them as self paced formative assessments.

Liz

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Friday, August 14, 2020 3:25 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Subject: Re: ANAT: Meet your Digital Dissector

Hi. Liz,

I was thinking this might be a good time for me to start on the dissection Module we can later share , in addition to those by Guiyun.

Do you think I can get a body for this?.

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Thursday, August 13, 2020 8:10 PM
To: Richard R. Schmidt <Richard.Schmidt@jefferson.edu>; Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Paul Howard <Paul.Howard@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Subject: ANAT: Meet your Digital Dissector
When: Friday, August 14, 2020 13:00-14:00.
Where: Blackboard Collaborate Guest Link: <https://us.bbcollab.com/guest/3e89e739a3884240a015659b0a634107>
<https://us.bbcollab.com/guest/3e89e739a3884240a015659b0a634107>
This is the Collaborate link for the Meet your Digital Dissector session

EXHIBIT 19

From: Elizabeth Spudich
Sent: Thursday, September 24, 2020 10:59 AM
To: Olutayo Ariyo
Cc: Sue Menko
Subject: Re: Dissection Update.

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Tayo

These dissections are NOT completed. The upper limb dissections are not much further than where the students left off last year.

You had copies of the structure lists, like all the other faculty, so you know what structures had to be dissected out.

You assured me and Dr Menko that upper and lower limb dissections would be completed on each cadaver by Monday 9/21/20.

Can you please explain how this might have happened

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Monday, September 21, 2020 9:20 AM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Dissection Update.

Hi Liz,

Dissections of 2 bodies completed. I hope to come in later to do some final review of the dissected structures clean up of structures, trimming more fat off and doing some imaging.that may be of some help in clinical Anatomy.

Thanks.

Tayo

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Thursday, September 17, 2020 10:42 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Dissection Plans
Tayo

I was taking an inventory of the dissections we have so far. Based on the below email you said you would have the two bodies dissected by today.

Right now, I see only the supine cadaver has been worked on, and then only the lower limb. Remember one upper and one lower limb needs to be completed on **each body**. Done in such a way as to highlight the structures best seen in each position. To facilitate the dissection of the prone cadaver we flipped the one you had not yet touched this morning.

Can you give me an updated timeline for FULL completion of all the required dissections on these cadavers?

Thanks
Liz-

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Monday, September 14, 2020 12:43 PM
To: Sue Menko <Sue.Menko@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Subject: Re: Dissection Plans
Thanks Dr. Menko,

My target was to complete the 2 dissections assigned latest by Thurs. the 17th. I will surely keep you updated on this Part of what I am incorporating are some power point pictures I take with my cell phone highlighting anatomical landmarks and a little bit of notes on clinical implications which I hope to share with other Faculty Members if they can find this useful. Will surely keep you updated on the progress made in the week.

Thanks/
Tayo.

From: Sue Menko <Sue.Menko@jefferson.edu>
Sent: Monday, September 14, 2020 11:27 AM

To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Subject: Re: Dissection Plans

Tayo,

The message from Liz raises concerns about your timely execution of the commitments that you have made to the course. Please provide your exact timeline for accomplishing these and let me know when you have completed these goals.

Sue

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Monday, September 14, 2020 10:56 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Dissection Plans

Tayo

As I mentioned in an earlier email, your priority for dissection **MUST** be to complete the dissection of the limbs on the cadavers in the **BLUE BAGS**.

You made a commitment to me and to the medical college that you would assist in generating these prosections for the upcoming Block 6 in person sessions.

I am concerned, that despite your email on Friday stating you would work on the specimens in Room 2, none of those have been touched.

If your commitment to assisting in the generation of the prosections, as well as participating in the in-person instructional sessions, has changed please let me know as soon as possible so I might plan accordingly

Regards

Liz-

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

EXHIBIT 20

From: Elizabeth Spudich
Sent: Monday, October 19, 2020 5:29 AM
To: Olutayo Ariyo
Cc: Stephen Peiper; Sue Menko
Subject: Re: Updating on Dissection Modules

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Tayo

Our need to instruct the students on musculoskeletal anatomy is part of our normal teaching assignment. It does not replace or remove other obligations or promises you've made to the Department, the medical school, or other programs with which you are involved.

The project we had agreed you would work on first, as an enhancement to the curriculum, was the male urogenital triangle, not the lower limb. That is the project you should be working on **in addition** to any teaching required of you as part of the normal curriculum. Please resume your work on the urogenital project during the times you are not working on normal curricular activities.

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Sunday, October 18, 2020 2:07 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Updating on Dissection Modules

Hi Liz,,

I was on this when more premium and urgency were placed on the Lower limb and Upper limb dissections and in teaching the students.

At this time, I will be requesting for a new computer
Wednesday last week, I had completed the pictorial teaching modules for the lower limb and had attempted e- mailing to the Chair, Vice Chair and yourself, only to find this was only saved as a draft only. It failed to transmit. . I called IS&T and was scheduled to talk with Bryan Kennedy, but Unfortunately , could not get this done before Ryan proceeded on a vacation on Friday. Bryan promised he would hand this over for someone who would reach out to me. to get back

On Friday, I encountered another problem with the computer. As soon as I clicked to run PowerPoint images, a click on any image was followed by a rightward migration of the images, resulting in images completely disappearing from the slide!!!!

IS&T failed to even remote my computer and another Ticket had been opened. These images were annotated images I had prepared. So sad.

Never Before had I witnessed such.

I have annotated the images to upper and lower limb dissected anatomical structures and my plan was to make these available to the whole Class to assist in their reviews, and added value right now and having successfully done this, go back to complete those of the Perineum whose need might not be of much importance in terms of need until later.

I hope I can get someone from IS & T to come in tomorrow to help resolve so that I am able to send these out to you all.

Meanwhile, I am respectfully requesting for a new computer.. The one I currently have is too much of a headache, very frustrating and a great hindrance to a streamline execution and forwarding my efforts as at when due

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Friday, October 16, 2020 11:42 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Updating on Dissection Modules

Tayo

Do you have an update on the status of the male urogenital triangle dissections and materials you agreed to generate on 8/21/2020?

That was the project you had agreed to work on first.

Liz-

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Wednesday, October 14, 2020 11:05 PM

To: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: Re: Updating on Dissection Modules

From: Olutayo Ariyo <oga101@jefferson.edu>

Date: Wednesday, October 14, 2020 at 10:25 PM

To: Stephen Peiper <Stephen.Peiper@jefferson.edu>, Sue Menko <Sue.Menko@jefferson.edu>, Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: RE: Updating on Dissection Modules

Dear All,

I am just reporting back to share with you some progress made towards my intended plan to making dissecting modules that cover all areas of the Human Gross Anatomy that we teach to our SKMC Students.

What I am sharing so far is a DRAFT of this in the anterior thigh compartment as an illustration template pattern to other regions.

What is sent on the anterior thigh is not totally exhaustive- still has room for a few more slides in functional anatomy and additional slide illustrations (e.g. Cutaneous Innervation).

The photographs I do take along as I go (using my cell phone).

My forwarding this is to give a birds eye view of what this project will eventually look like

1. Anatomic dissection Images
2. Annotation of structures
3. Discuss some vital anatomical landmarks.
4. Clinical Notes.

The ones to cover Posterior thigh, Anterior leg and dorsum of foot plus Post. Leg and the Muscular layers of the foot will soon follow and later those for the upper limb..

I look forward to your comments, critics, suggestions and what I can add to give more value to this project.

I thank the Department for allowing me to do this.

Tayo.

EXHIBIT 21

From: Sue Menko
Sent: Monday, October 19, 2020 7:31 AM
To: Elizabeth Spudich
Cc: Stephen Peiper
Subject: Re: Updating on Dissection Modules

Follow Up Flag: Follow up
Flag Status: Flagged

Liz,

I have read your concerns and understand your frustration.

As you I believe know, I communicate with Tayo when I am copied on an e-mail that you send him to hold him accountable to his commitments, whether or not I copy you on my messages to him. However, and as we have previously discussed, for me to keep on top of things requires that I have regular, updated information from you on issues as they arise, so that I can address them before they become a crisis for the course.

How can we best support you so that situations like you describe below with 2 months going by before you are made aware that Tayo is not meeting his agreed to obligations do not happen again.

Regarding his technology training, we were told that his training and the assessment of his ability to master the required technology was being handled through the library resources and that this should not be in the hands of our department. I do not have an answer for you as to where this assessment stands. I have not been included in any communications regarding this issue.

Sue

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Monday, October 19, 2020 6:53 AM
To: Sue Menko <Sue.Menko@jefferson.edu>
Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Subject: Fw: Updating on Dissection Modules

Sue

I have some concerns with Dr. Ariyo' recent emails.

On August 21, 2020, following a series of emails on which you were cc'd, Dr. Ariyo agreed his first project would be to generate materials for the Male Urogenital Triangle. There is currently a gap in our supportive curricular materials for this region and, as Thread Director, I felt this was a contribution he could make while dealing with the tech issues that have limited his inclusion in on-line instruction.

Now, almost 2 months later, I am hearing he took it upon himself to stop work on the initial project and begin work on a separate region. He did not alert me to this pivot, he did not ask if these materials were needed and he has not provided me with any true updates on the status of the agreed upon project or the new one.

It also appears he is still struggling with technology. IS&T has reviewed his hardware and found nothing amiss. He claimed to have purchased a new computer to do work at home, which should, with the various cloud services provided by the university, be more than adequate to continue his work, even if his office computer is down. He has had 3 months to sharpen on his ability to navigate a variety of educational platforms yet, it appears from his recent email, that he is still struggling with even the most basic of software applications.

I am concerned by this lack of progress on the technical side. Technology is part of the JeffMD curriculum, irrespective of the pandemic. It is part of clinical medicine and its role in medical education will only get larger. I don't know what that means for Dr Ariyo, who, despite have a knowledge of anatomy, can't deliver it to a 21st century medical student.

I also feel it is unacceptable that he continues to disregard curricular needs to pursue his own interests and in his own timeframe. It continues a familiar trend of Dr Ariyo ignoring many of my suggestions, requests, and deadlines; from recent requests that he generate study materials for Blocks 1 and 5, to not completing his Block 6 prosecutions by the set deadline, to numerous requests to review exams and other curricular documents over the years and even the missing of teaching assignments to handle personal business.

I am at a loss to understand this behavior. He has expressed displeasure with the JeffMD curriculum in the past and the teaching requirements of the Anatomy Thread and perhaps this is a contributing factor. Maybe he simply has difficulty taking direction or feedback from me, someone he may consider less experienced. Regardless, I have real concerns about his willingness to complete future requests I might make of him in support the anatomy thread in JeffMD.

I welcome any insight you might bring to this matter.

Liz-

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Sunday, October 18, 2020 2:07 PM

To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Updating on Dissection Modules

Hi Liz,,

I was on this when more premium and urgency were placed on the Lower limb and Upper limb dissections and in teaching the students.

At this time, I will be requesting for a new computer

Wednesday last week, I had completed the pictorial teaching modules for the lower limb and had attempted e- mailing to the Chair, Vice Chair and yourself, only to find this was only saved as a draft only. It failed to transmit. . I called IS&T and was scheduled to talk with Bryan Kennedy, but Unfortunately , could not get this done before Ryan proceeded on a vacation on Friday. Bryan promised he would hand this over for someone who would reach out to me. to get back

On Friday, I encountered another problem with the computer. As soon as I clicked to run PowerPoint images. a click on any image was followed by a rightward migration of the images , resulting in images completely disappearing from the slide!!!!

IS&T failed to even remote my computer and another Ticket had been opened. These images were annotated images I had prepared. So sad.

Never Before had I witnessed such.

I have annotated the images to upper and lower limb dissected anatomical structures and my plan was to make these available to the whole Class to assist in their reviews, and added value right now and having successfully done this, go back to complete those of the Perineum whose need might not be of much importance in terms of need until later.

I hope I can get someone from IS &T to come in tomorrow to help resolve so that I am able to send these out to you all.

Meanwhile, I am respectfully requesting for a new computer.. The one I currently have is too much of a headache, very frustrating and a great hindrance to a streamline execution and forwarding my efforts as at when due

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Friday, October 16, 2020 11:42 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Updating on Dissection Modules

Tayo

Do you have an update on the status of the male urogenital triangle dissections and materials you agreed to generate on 8/21/2020?

That was the project you had agreed to work on first.

Liz-

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Wednesday, October 14, 2020 11:05 PM

To: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: Re: Updating on Dissection Modules

From: Olutayo Ariyo <oga101@jefferson.edu>

Date: Wednesday, October 14, 2020 at 10:25 PM

To: Stephen Peiper <Stephen.Peiper@jefferson.edu>, Sue Menko <Sue.Menko@jefferson.edu>, Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: RE: Updating on Dissection Modules

Dear All,

I am just reporting back to share with you some progress made towards my intended plan to making dissecting modules that cover all areas of the Human Gross Anatomy that we teach to our SKMC Students.

What I am sharing so far is a DRAFT of this in the anterior thigh compartment as an illustration template pattern to other regions.

What is sent on the anterior thigh is not totally exhaustive- still has room for a few more slides in functional anatomy and additional slide illustrations (e.g. Cutaneous Innervation).

The photographs I do take along as I go (using my cell phone).

My forwarding this is to give a birds eye view of what this project will eventually look like

1. Anatomic dissection Images
2. Annotation of structures
3. Discuss some vital anatomical landmarks.
4. Clinical Notes.

The ones to cover Posterior thigh, Anterior leg and dorsum of foot plus Post. Leg and the Muscular layers of the foot will soon follow and later those for the upper limb..

I look forward to your comments, critics, suggestions and what I can add to give more value to this project.

I thank the Department for allowing me to do this.

Tayo.

EXHIBIT 22

From: Elizabeth Spudich
Sent: Tuesday, October 20, 2020 6:42 AM
To: Olutayo Ariyo
Cc: Sue Menko
Subject: Re: Question for future planning of prosection sessions for Head and neck

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks, Tayo

I have no email from you like this. Do you have a record in your sent folder? I'd like to figure out why I might not have gotten this

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Monday, October 19, 2020 6:44 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Question for future planning of prosection sessions for Head and neck

Hi Liz,

I remembered vividly responding to this earlier on, that 45 minutes may not be sufficient, but adding that 60 minutes is about right.

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Monday, October 19, 2020 1:04 PM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Question for future planning of prosection sessions for Head and neck

Tayo

as outlined in the email the information I need to know is how long you think it will take to review all these items in prosection.

One or two 45-minute sessions?

thanks-

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Monday, October 19, 2020 12:17 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Question for future planning of prosection sessions for Head and neck
I thought I gave an immediate response to this after reading through ?. In case I did not I found the list very comprehensive.
Thanks.
Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Monday, October 19, 2020 9:20 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Fw: Question for future planning of prosection sessions for Head and neck
Tayo
Can you please respond to this email I sent 2 weeks ago requesting information/opinions on Block 7 prosections?

Thanks

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Sent: Monday, October 5, 2020 12:56 PM
To: Richard R. Schmidt <Richard.Schmidt@jefferson.edu>; Paul Howard <Paul.Howard@jefferson.edu>; Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Olutayo Ariyo

<Olutayo.Ariyo@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>; Amy Amabile
<Amy.Amabile@jefferson.edu>

Subject: Question for future planning of prosection sessions for Head and neck

Good afternoon,

Attached is a list of structures we would need to review for Block 7 Head and Neck prosections in JANUARY.

Please review and using your considerable combined knowledge and reflecting on our experiences from last week please let me know how long it would take you to review these structures in a prosected specimen with a group of students?

We are tight on time in January once we get back from break and after all the students' quarantine

Thanks

Liz-

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

EXHIBIT 23

From: Elizabeth Spudich
Sent: Friday, November 6, 2020 9:05 AM
To: Deborah Ziring
Cc: Steven Herrine
Subject: Re: Updating on Dissection Modules

Follow Up Flag: Follow up
Flag Status: Flagged

not really,

Below was her reply suggesting I am not altering her to issues. I do have a list of over 20 emails that she was cc'd on between 8/13 and 10/13 showing a clear pattern, at least to me. And I have no way of knowing what she may or may not have communicated to him about what she, as his manager, expects.

I was going to draft a detailed rebuttal email and include them but... why? It would take way too much energy, and I have too much to do to keep the thread running. Nothing he does, or doesn't do puts JeffMD in crisis, I would never let that happen.

It also seemed clear from this email that she was not following his technology training, either. Even though those issue started in July. I was specifically told during my annual review to stay away from that, as Faculty affairs was handling it.

Liz,

I have read your concerns and understand your frustration.

As you I believe know, I communicate with Tayo when I am copied on an e-mail that you send him to hold him accountable to his commitments, whether or not I copy you on my messages to him. However, and as we have previously discussed, for me to keep on top of things requires that I have regular, updated information from you on issues as they arise, so that I can address them before they become a crisis for the course.

How can we best support you so that situations like you describe below with 2 months going by before you are made aware that Tayo is not meeting his agreed to obligations do not happen again.

Regarding his technology training, we were told that his training and the assessment of his ability to master the required technology was being handled through the library resources and that this should not be in the hands of our department. I do not have an answer for you as to where this assessment stands. I have not been included in any communications regarding this issue.

Sue

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Deborah Ziring <Deborah.Ziring@jefferson.edu>
Sent: Friday, November 6, 2020 8:35 AM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Steven Herrine <Steven.Herrine@jefferson.edu>
Subject: Re: Updating on Dissection Modules
Any f/u on this from Drs. Menko or Peiper?
Deb
Deborah Ziring, MD
Senior Associate Dean SKMC Academic Affairs/UME

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Date: Monday, October 19, 2020 at 6:53 AM
To: Sue Menko <Sue.Menko@jefferson.edu>
Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Subject: Fw: Updating on Dissection Modules
Sue

I have some concerns with Dr. Ariyo' recent emails.

On August 21, 2020, following a series of emails on which you were cc'd, Dr. Ariyo agreed his first project would be to generate materials for the Male Urogenital Triangle. There is currently a gap in our supportive curricular materials for this region and, as Thread Director, I felt this was a contribution he could make while dealing with the tech issues that have limited his inclusion in on-line instruction.

Now, almost 2 months later, I am hearing he took it upon himself to stop work on the initial project and begin work on a separate region. He did not alert me to this pivot, he did not ask if these materials were needed and he has not provided me with any true updates on the status of the agreed upon project or the new one.

It also appears he is still struggling with technology. IS&T has reviewed his hardware and found nothing amiss. He claimed to have purchased a new computer to do work at home, which should, with the various cloud services provided by the university, be more than adequate to continue his work, even if his office computer is down. He has had 3 months to sharpen on his ability to navigate a variety of educational platforms yet, it appears from his recent email, that he is still struggling with even the most basic of software applications.

I am concerned by this lack of progress on the technical side. Technology is part of the JeffMD curriculum, irrespective of the pandemic. It is part of clinical medicine and its role in medical education will only get larger. I don't know what that means for Dr Ariyo, who, despite have a knowledge of anatomy, can't deliver it to a 21st century medical student.

I also feel it is unacceptable that he continues to disregard curricular needs to pursue his own interests and in his own timeframe. It continues a familiar trend of Dr Ariyo ignoring many of my suggestions, requests, and deadlines; from recent requests that he generate study materials for Blocks 1 and 5, to not completing his Block 6 prosecutions by the set deadline, to numerous requests to review exams and other curricular documents over the years and even the missing of teaching assignments to handle personal business.

I am at a loss to understand this behavior. He has expressed displeasure with the JeffMD curriculum in the past and the teaching requirements of the Anatomy Thread and perhaps this is a contributing factor. Maybe he simply has difficulty taking direction or feedback from me, someone he may consider less experienced. Regardless, I have real concerns about his willingness to complete future requests I might make of him in support the anatomy thread in JeffMD.

I welcome any insight you might bring to this matter.

Liz-

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Sunday, October 18, 2020 2:07 PM

To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Updating on Dissection Modules

Hi Liz,,

I was on this when more premium and urgency were placed on the Lower limb and Upper limb dissections and in teaching the students.

At this time, I will be requesting for a new computer

Wednesday last week, I had completed the pictorial teaching modules for the lower limb and had attempted e- mailing to the Chair, Vice Chair and yourself, only to find this was only saved as a draft only. It failed to transmit. . I called IS&T and was scheduled to talk with Bryan Kennedy, but Unfortunately , could not get this done before Ryan proceeded on a vacation on Friday. Bryan promised he would hand this over for someone who would reach out to me. to get back On Friday, I encountered another problem with the computer. As soon as I clicked to run PowerPoint images. a click on any image was followed by a rightward migration of the images , resulting in images completely disappearing from the slide!!!!

IS&T failed to even remote my computer and another Ticket had been opened. These images were annotated images I had prepared. So sad.

Never Before had I witnessed such.

I have annotated the images to upper and lower limb dissected anatomical structures and my plan was to make these available to the whole Class to assist in their reviews, and added value right now and having successfully done this, go back to complete those of the Perineum whose need might not be of much importance in terms of need until later.

I hope I can get someone from IS &T to come in tomorrow to help resolve so that I am able to send these out to you all. Meanwhile, I am respectfully requesting for a new computer.. The one I currently have is too much of a headache, very frustrating and a great hindrance to a streamline execution and forwarding my efforts as at when due

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Friday, October 16, 2020 11:42 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Updating on Dissection Modules

Tayo

Do you have an update on the status of the male urogenital triangle dissections and materials you agreed to generate on 8/21/2020?

That was the project you had agreed to work on first.

Liz-

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Wednesday, October 14, 2020 11:05 PM

To: Stephen Peiper <Stephen.Peiper@jefferson.edu>; Sue Menko <Sue.Menko@jefferson.edu>; Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: Re: Updating on Dissection Modules

From: Olutayo Ariyo <oga101@jefferson.edu>

Date: Wednesday, October 14, 2020 at 10:25 PM

To: Stephen Peiper <Stephen.Peiper@jefferson.edu>, Sue Menko <Sue.Menko@jefferson.edu>, Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: RE: Updating on Dissection Modules

Dear All,

I am just reporting back to share with you some progress made towards my intended plan to making dissecting modules that cover all areas of the Human Gross Anatomy that we teach to our SKMC Students.

What I am sharing so far is a DRAFT of this in the anterior thigh compartment as an illustration template pattern to other regions.

What is sent on the anterior thigh is not totally exhaustive- still has room for a few more slides in functional anatomy and additional slide illustrations (e.g. Cutaneous Innervation).

The photographs I do take along as I go (using my cell phone).

My forwarding this is to give a birds eye view of what this project will eventually look like

1. Anatomic dissection Images
2. Annotation of structures
3. Discuss some vital anatomical landmarks.
4. Clinical Notes.

The ones to cover Posterior thigh, Anterior leg and dorsum of foot plus Post. Leg and the Muscular layers of the foot will soon follow and later those for the upper limb..

I look forward to your comments, critics, suggestions and what I can add to give more value to this project.

I thank the Department for allowing me to do this.

Tayo.

EXHIBIT 24

From: Elizabeth Spudich
Sent: Wednesday, July 14, 2021 4:21 PM
To: Sue Menko
Subject: Fw: Request for information

Follow Up Flag: Follow up
Flag Status: Flagged

Sue,
I find this to be another questionable excuse.

Even if he was having tech issues yesterday my requests for this information went out on July 7 and July 9. It is my understanding that he only has dissection responsibilities 3 afternoons a week.

From my perspective he only seems to have major tech issues when he has missed a deadline on some deliverable.

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Wednesday, July 14, 2021 12:48 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Request for information

Hi Liz,

As soon as I came in today, even before going into my Office to have a access to my Jeffmail, I stopped briefly by your room to explain some technical difficulties I was having that denied me access to Jeffmail , which climaxed into severance with Jefferson as I needed text code from IS&T. My cell phone was and is still hacked and was going to be active in the next 72 hours (then) remaining 48 hours.

Was my mistake however that I thought deadline was the 13th as I struggled feverishly to send a reply back yesterday.

I have requested severally for placement into the CBL Program if an opening came up. Looks this has not been the case.

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Tuesday, July 13, 2021 5:18 PM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Fw: Request for information

Tayo

Can you please send me the below information on CBL I requested by July 9th

Thanks

Liz

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Wednesday, July 7, 2021 8:08 AM

To: Richard R. Schmidt <Richard.Schmidt@jefferson.edu>; Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Paul Howard <Paul.Howard@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Subject: Request for information

Good morning

As we move forward into next year can each of you please let me know the following information? I will need it for scheduling purposes

Are you a CBL Facilitator for JeffMD this academic year?

If so, in which Blocks are you a CBL facilitator?

On which days of the week are you facilitating?

In which time slot are you assigned?

I will need this information by **July 9, 2021, 12 noon.**

Please respond even if you are not doing CBL this year so I have something to track.

And, Please don't just reply "the same as last year". I don't have everyone's schedule memorized.

Thanks

Liz-

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

EXHIBIT 25

From: Elizabeth Spudich
Sent: Friday, July 16, 2021 2:43 PM
To: Sue Menko
Subject: Re: Request for information

Follow Up Flag: Follow up
Flag Status: Flagged

Sue

I have no knowledge of what he might have said to you about lecturing.

My hesitance is still there, in part, due to past performance, but more so, because his present actions have not shown me that any substantial changes have occurred.

He has not demonstrated to me any desire to become a vital contributor to the Anatomy Thread in the JeffMD curriculum.

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Sue Menko <Sue.Menko@jefferson.edu>
Sent: Wednesday, July 14, 2021 5:26 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Subject: Re: Request for information

I do know that he is anxious to participate in lectures, etc. in the dissection and histology courses – it was my understanding that you were not in favor of scheduling him for those because of past issues. Please let me know if I am incorrect.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Date: Wednesday, July 14, 2021 at 4:59 PM
To: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Request for information

In JeffMD he is supposed to be doing all dissections, all histology and all Neuro labs

Right now, in the summer PA course, he only is in lab 3 afternoons a week.

The phase 1 sessions for JeffMD start up in two weeks.

My frustration is Dr. Ariyo has every morning open and all of Tuesday and Thursday. PA dissection is MWF afternoons.

Other faculty who have more responsibilities in the PA course and who are also involved with prep for upcoming JeffMD blocks have all been able to handle the requests I've made in preparation for JeffMD.

It seems, from this last episode, that Dr Ariyo is still hampered by the technology he needs to effectively do his job.

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

From: Sue Menko <Sue.Menko@jefferson.edu>

Sent: Wednesday, July 14, 2021 4:31 PM

To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Subject: Re: Request for information

I believe that in the new curriculum has Tayo been assigned to dissection labs – is that correct? Or are you conveying that this year is different. I know he has not been involved in CBL.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Date: Wednesday, July 14, 2021 at 4:20 PM

To: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Fw: Request for information

Sue,

I find this to be another questionable excuse.

Even if he was having tech issues yesterday my requests for this information went out on July 7 and July 9.

It is my understanding that he only has dissection responsibilities 3 afternoons a week.

From my perspective he only seems to have major tech issues when he has missed a deadline on some deliverable.

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Sent: Wednesday, July 14, 2021 12:48 PM

To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Re: Request for information

Hi Liz,

As soon as I came in today, even before going into my Office to have a access to my Jeffmail, I stopped briefly by your room to explain some technical difficulties I was having that denied me access to Jeffmail , which

climaxed into severance with Jefferson as I needed text code from IS&T. My cell phone was and is still hacked and was going to be active in the next 72 hours (then) remaining 48 hours.

Was my mistake however that I thought deadline was the 13th as I struggled feverishly to send a reply back yesterday.

I have requested severally for placement into the CBL Program if an opening came up. Looks this has not been the case.

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Tuesday, July 13, 2021 5:18 PM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Cc: Sue Menko <Sue.Menko@jefferson.edu>

Subject: Fw: Request for information

Tayo

Can you please send me the below information on CBL I requested by July 9th

Thanks

Liz

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology

JeffMD Anatomy Thread Director

JeffMD Cardiopulmonary Block Co-Director

Sidney Kimmel Medical College

Thomas Jefferson University

215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."

- Aristotle

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Wednesday, July 7, 2021 8:08 AM

To: Richard R. Schmidt <Richard.Schmidt@jefferson.edu>; Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Paul Howard <Paul.Howard@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Subject: Request for information

Good morning

As we move forward into next year can each of you please let me know the following information? I will need it for scheduling purposes

Are you a CBL Facilitator for JeffMD this academic year?

If so, in which Blocks are you a CBL facilitator?

On which days of the week are you facilitating?

In which time slot are you assigned?

I will need this information by **July 9, 2021, 12 noon.**

Please respond even if you are not doing CBL this year so I have something to track.

And, Please don't just reply "the same as last year". I don't have everyone's schedule memorized.

Thanks

Liz-

Elizabeth A. Spudich, PhD (she/her)

Assistant Professor

Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

EXHIBIT 26

From: Guiyun Zhang
Sent: Thursday, July 22, 2021 9:29 AM
To: Elizabeth Spudich
Subject: FW: Lab absence

Follow Up Flag: Follow up
Flag Status: Flagged

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Date: Wednesday, July 21, 2021 at 12:49 PM
To: Sue Menko <Sue.Menko@jefferson.edu>, Guiyun Zhang <Guiyun.Zhang@jefferson.edu>
Subject: Re: Lab absence

Thanks. Dr. Menko,

I was already in the lab. by the time Dr. Zhang sent her mail which I have just opened to read.. Responding constantly to some unauthenticated reporting from diverse quarters takes away so much from quality time for more serious issues.

June 23rd, my plane landed in Philadelphia after being airborne 3 days in a row. I did not stop at home as I knew I was scheduled for Lab. dissection at 1PM. That is who Tayo is. It was my cancelled flight from Dulles to Philadelphia on 6/22 that delayed my arrival in Philadelphia till 6/23. I made no excuses., headed straight from Airport to the dissecting room.

Since returning on the 23rd, I had reported for all dissecting sessions. Yesterday, I experienced severe muscle spasm in my left lower limb. Liz was informed. Attempting to drive this morning aggravated this, turned back home and sought help from my son. I know how vital reviews are to the Students at this time are and I tried to do my best to be there for them. My apologies for not sending I was running a little bit late.

Besides the heavy load of dissection hours and readjusting back to work after a bilateral knee surgery earlier in the year has not been much fun. Occasional pain here and there and the discomfort of moving my stool from table to table in the lab,- a readjustment feat indeed.

Since coming back from my trip on 6/23, I have given over 15 hours of my time attending to students needs in the lab., all scheduled for after 4.30 pm, just to give extra help.

I know when it is out of concern notes are sent around, I also do know when otherwise.

Thanks.

Tayo.

From: Sue Menko <Sue.Menko@jefferson.edu>
Sent: Wednesday, July 21, 2021 10:26 AM
To: Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Subject: Re: Lab absence

Tayo,

It is essential that you fulfill your obligations to the students and your colleagues in this course. Please explain why you weren't there and make sure that this situation is not repeated.

Sue

From: Guiyun Zhang <Guiyun.Zhang@jefferson.edu>

Date: Wednesday, July 21, 2021 at 10:23 AM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>, Sue Menko <Sue.Menko@jefferson.edu>

Subject: Lab absence

Dear Tayo,

You have scheduled lab instruction in the dissection room today beginning at 9:00am.

Students told me you were not here.

I am in the lab now and do not see you.

It is 10:20 now and you are missing the morning dissection. I have not received any notice from you regarding your absence from the lab.

Dr. Menko,

Can you check with Tayo?

I am stepping in the lab to cover Tayo.

Guiyun

Sent from my iPhone

EXHIBIT 27

From: Sue Menko
Sent: Friday, August 13, 2021 8:37 AM
To: Elizabeth Spudich; Olutayo Ariyo
Subject: Re: Request for A Leave 8/25- 9/1/2021

Follow Up Flag: Follow up
Flag Status: Flagged

I support Dr. Spudich in her decision.
Sue

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Date: Friday, August 13, 2021 at 8:19 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Cc: Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Request for A Leave 8/25- 9/1/2021

Tayo, I am not comfortable with you not being here during assessment week.

It is the first practical exam for the first-year students and some of them may want to meet with their dissection room instructors prior to the exam.

In addition, there will be exam documents for faculty to review before the exam.

Also, air travel has been very sketchy of late. I had a flight cancelled on me last week, and I know you had travel issues over the summer. This makes me nervous about you being available at 8 am on 9/2 for proctoring the exam.

And lastly, I'm a bit nervous with you coming directly into an exam situation immediately after international travel what with the delta strain of COVID being so nasty.

Is there any way this could be rescheduled for the week after? We have absolutely NO teaching responsibilities during from 9/3 until 9/13.

Elizabeth A. Spudich, PhD (she/her)
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Thursday, August 12, 2021 10:01 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Subject: Request for A Leave 8/25- 9/1/2021

Hi Liz,

I am running this by you to see if it is approved so I can then communicate this to Dr. Menko.. I am the Sole Administrator to my late Brother's Estate. It is time to do some financial paper-work and hand-over to my Nieces and Nephews.

I am planning to be away, travelling to Nigeria between 8/25/2021, hoping to return to work on 9/1/2021. However, on 9/1/2021, there is a scheduled Examination Set up. In case I am not scheduled for this or if you can oblige, I will be requesting to be off 8/25 -9/1/2021, returning to work on 9/2/2021.

Thanking you.

Tayo.

EXHIBIT 28

From: Elizabeth Spudich
Sent: Thursday, July 30, 2020 12:41 PM
To: Olutayo Ariyo
Cc: Sue Menko
Subject: Re: ANAT: (Group A) Connective Tissues

Follow Up Flag: Follow up
Flag Status: Flagged

Tayo

For right now I would continue to work on your training. I know from your emails that your Canvas/collaborate training was cut short yesterday by computer issues. Have those, from yesterday, been resolved?

Until all those things are resolved and you can demonstrate the ability to run a collaborate classroom I can't give you moderator status. The system is too complex. And without moderator status you don't have the ability to freely circulate through the rooms and instruct as needed for this type of digital delivery.

On Tuesday in the first Histo lab, I tried to work the group rooms and bring you along as I moved and it was very difficult for me and I know the Collaborate platform very well.

I know he has given you an enormous amount of help over the last two weeks, but this technology is pretty new for Bruce too. During this scheduled teaching time, I need his full attention to be on the students.

If, in the next week, or so you complete your training, and get the computer all updated, we'll run you through some practice sessions and see if you are ready for a solo flight.

Liz-

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D
"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Sent: Thursday, July 30, 2020 12:06 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Subject: Re: ANAT: (Group A) Connective Tissues

Hi Liz,

GM. Just curious, what will be my role for today's virtual dissection? Can work with Bruce.

Thanks.

Tayo.

From: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>

Sent: Wednesday, July 29, 2020 2:56 PM

To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>

Subject: Canceled: ANAT: (Group A) Connective Tissues

When: Thursday, July 30, 2020 11:00-12:00.

Where: Live Collaborate Session

If you have a conflict with this time slot due to CBL Please let me know.

Newly attached are the documents the students are receiving and a version of the articulate file is in my canvas course page

The Collaborate link will be <https://us.bbcollab.com/guest/91c019f7497b408fb50d6a8146021dab>

EXHIBIT 29

Dissection Lab (8/23/19, 6:00 AM)

of responses: 88

1. I was satisfied with Block 1 dissection overall.

<i>Strongly Disagree</i> (0.00%)	<i>Disagree</i> (3.41%)	<i>Neutral</i> (4.55%)	<i>Agree</i> (48.86%)	<i>Strongly Agree</i> (43.18%)
-------------------------------------	----------------------------	---------------------------	--------------------------	-----------------------------------

2. Learning objectives for each dissection ("what I was supposed to learn") were made clear.

<i>Strongly Disagree</i> (1.14%)	<i>Disagree</i> (10.23%)	<i>Neutral</i> (9.09%)	<i>Agree</i> (44.32%)	<i>Strongly Agree</i> (35.23%)
-------------------------------------	-----------------------------	---------------------------	--------------------------	-----------------------------------

3. The course materials (VHDissector, required atlas, peer teaching, self-paced modules) were valuable for learning.

<i>Strongly Disagree</i> (2.27%)	<i>Disagree</i> (1.14%)	<i>Neutral</i> (12.50%)	<i>Agree</i> (43.18%)	<i>Strongly Agree</i> (40.91%)
-------------------------------------	----------------------------	----------------------------	--------------------------	-----------------------------------

4. The dissection room had adequate instructor support.

<i>Strongly Disagree</i> (1.14%)	<i>Disagree</i> (3.41%)	<i>Neutral</i> (2.27%)	<i>Agree</i> (47.73%)	<i>Strongly Agree</i> (45.45%)
-------------------------------------	----------------------------	---------------------------	--------------------------	-----------------------------------

Faculty Feedback

Group 1

Redacted

Redacted

Dr. Olutayo Ariyo is a **valuable educational resource** in the dissecting room..

Strongly Disagree
(0.00%)

Disagree
(7.41%)

Neutral
(33.33%)

Agree
(33.33%)

Strongly Agree
(25.93%)

Please provide reinforcing comments and suggestions for Dr. Olutayo Ariyo and this session.
(optional)

Very clearly knowledgeable and very personable, a solid instructor. Sometimes I feel that your tips could be a bit more succinct and practical.

When Dr. Ariyo circulates, whether or not we've asked a question, it seems like he frequently strays off topic or rambles. I suggest asking if we need help, and if we don't have questions, moving on. If we have a question, I would appreciate it if the answer was only relevant to the structures and functions that are relevant to the material (and assessment) at hand.

N/A

He would answer the question we asked him but then continue talking about a vaguely related aspect (e.g. asking whether we isolated the right nerve, and then he would talk for 5 minutes about deep fascia). We appreciate the extra insight but we also wanted to carry on dissecting other structures

I did not have Dr. Ariyo for dissection

Dr. Ariyo did well with helping students make connections between lecture material, structures within the human gifts and why things are how they are in anatomy.

Dr. Ariyo is very thorough, his explanation of brachial plexus vessels was extremely helpful

Na

Dr. Ariyo has a great way of adding context to the dissection labs that we are doing. His understanding of the human body is incredibly amazing and his ability to give us a clinical perspective to what we are cutting keeps me engaged and excited to continue.

Group 3

Redacted

Surgical Anatomy 2019 (Head and Neck) : Course Evaluation

[REDACTED]@gmail.com>

1. From 1 (poorest) to 10 (best), please rate your overall impression of the course?

10

2. On a scale of 1 (poorest)-10 best, what score will you give to your Instructor- Dr. Ariyo in the following dispensations:

(a) Effort 10

(b) .Effectiveness of lectures 10

(c). Help in the cadaver room 10

(d). Knowledge of Clinical Anatomy 10

(e) Discussions on surgical landmarks 10

3. What is one thing you liked best about the course? Course included reviewing anatomy/key features followed by hands-on learning. Dr. Ariyo was very attentive and helpful in answering our questions.

4. What, if anything, should be added to improve the course? Having a fresh frozen cadaver could be a nice addition.

5. What are your thoughts on how many weeks (the duration) of the course ran? Fine, would keep the number.

If you would make any changes, would you add/take away any time? I thought there were the appropriate number of weeks.

6. What is one thing you will take away from the course and put to use in your everyday practice? From a surgical perspective, gave me appreciation for the depth of particular structures. In addition, to appreciate that not every patient follows the textbooks with location of particular structures and that there is variety among patients.

7. On a scale of 1 (poorest)-10 (best), how likely are you going to recommend this to your future colleagues ? 10

8. What are the strength of your Instructor- Dr. Ariyo- he is an excellent instructor. Very knowledgeable. Kind. Approachable. It is apparent that he enjoys anatomy and teaching. His enthusiasm for the course certainly enhanced my enjoyment of the course.

9. What are the weaknesses of your Instructor- Dr. Ariyo- none

Dissection Lab (10/1/19, 6:00 AM)

of responses: 80

1. I was satisfied with Block 6 dissection overall.

<i>Strongly Disagree</i> (2.50%)	<i>Disagree</i> (5.00%)	<i>Neutral</i> (17.50%)	<i>Agree</i> (48.75%)	<i>Strongly Agree</i> (26.25%)
-------------------------------------	----------------------------	----------------------------	--------------------------	-----------------------------------

2. Learning objectives for each dissection ("what I was supposed to learn") were made clear.

<i>Strongly Disagree</i> (2.50%)	<i>Disagree</i> (1.25%)	<i>Neutral</i> (15.00%)	<i>Agree</i> (51.25%)	<i>Strongly Agree</i> (30.00%)
-------------------------------------	----------------------------	----------------------------	--------------------------	-----------------------------------

3. The course materials (VHDissector, required atlas, peer teaching, self-paced modules) were valuable for learning.

<i>Strongly Disagree</i> (2.50%)	<i>Disagree</i> (1.25%)	<i>Neutral</i> (18.75%)	<i>Agree</i> (43.75%)	<i>Strongly Agree</i> (33.75%)
-------------------------------------	----------------------------	----------------------------	--------------------------	-----------------------------------

4. The dissection room had adequate instructor support.

<i>Strongly Disagree</i> (2.50%)	<i>Disagree</i> (5.00%)	<i>Neutral</i> (16.25%)	<i>Agree</i> (41.25%)	<i>Strongly Agree</i> (35.00%)
-------------------------------------	----------------------------	----------------------------	--------------------------	-----------------------------------

Faculty Feedback

Group 1

Redacted

answer questions which can make things a little confusing. Other than that he's a great resource. Also could be helpful if when he is helping, to maybe narrate what he's doing.

Dr. Ariyo helped us quite a lot with our dissection and teaching us important landmarks!!

Dr. Ariyo is very knowledgeable and that is clear when he comes around to help teach.

Dr. Ariyo can sometimes make getting through our dissection difficult. He'll come over to our table and ask us quiz questions when we are trying to figure out how to proceed with something entirely different. I know he is engaged and wants to help us learn, but sometimes I wish he'd stick more with what we needed in the moment than with what he has in his mind to teach us that day.

What could be improved in dissection for Block 6? (*optional*)

I think the split start times and having 2 faculty + resident in the room made things A LOT better. It was just a lot to dissect and learn in a short period. For time purposes, it might be better to only require half the body to be dissected since the left and right sides have the same things, or split things up more so both A and B group have to do similar amounts of dissection (e.g. for the day we dissected the thigh, leave the glutes to the A group since they had less to do the day after)

N/A

An announcement before the pre-lab presentation would be great, and a reminder to the students working to please keep it down.

More sessions with more evenly spaced out dissections. These were too long. Also, it would be so nice to have dissection a full week after the anatomy lectures, that way we have a better understanding of the million things we are seeing

Dissecting the distal limb and hand/foot in the same dissection, especially when starting at 2pm is very difficult, and we had trouble finishing the dissection.

The dissections were long, but good.

We did not dissect joints or really do the foot or hand which I thought was a negative. Also our

Group B consistently had a hard time scheduling teaching/remembering to come in to teach, so that was detrimental.

More explanation of anomalies that we may see, clinical correlates, etc. Maybe some TBL's.

Perhaps an earlier dissection review or a demonstration in lab of quizzing fast (1 minute) since the practical was difficult regarding timing and thinking fast.

For the practical, I like the old format better. I don't like waiting in line for the practical to start for 10-15 minutes.

The split start times are mostly helpful except for at the end of dissection (around 4-4:30) the extra residents and faculty start to leave, leaving only **Redacted** to help the four groups left that had the later start time. Also with the forearm dissection, we needed more than 3 hours so starting at two we didn't finish by 5

none

Instructor support was valuable when we had it. However, towards the end of the allotted time for students in the lab, we did not have that support.

I enjoyed dissection, however there was some disconnect between A and B groups- the other group didn't complete their dissection leaving us to do large portions of theirs as well as ours. Not sure how to fix this. Also in general the dissection were very long, again not sure if this can be avoided given the amount of content.

Having the PM&R Faculty/residents available in dissection was so incredibly helpful. thank you for bringing this to our dissection-it was immensely helpful!

Very hard to get time with the instructors even with the staggered timings.

Better self-policing from faculty in terms of rotating through tables. I loved having the Monday of exam week review with the faculty - that was super helpful.

Different faculty had different approaches for the start of dissection overview/mini lecture. I found that some were more helpful than others. Diagrams and visualizations are much more helpful than spoken lecture.

dissection of the joints!!!

I thought that there was a ton to do in these dissections (especially for C group). I'm not sure but I might have preferred doing another day of dissection over what we had, because it was really overwhelming.

Redacted

EXHIBIT 30

From: Richard R. Schmidt
Sent: Wednesday, May 27, 2020 10:20 AM
To: Elizabeth Spudich
Subject: FW: Final Block 4B dissection materials

Follow Up Flag: Follow up
Flag Status: Flagged

From: olutayo ariyo <Olutayo.Ariyo@jefferson.edu>
Date: Wednesday, May 27, 2020 at 10:09 AM
To: "Richard R. Schmidt" <Richard.Schmidt@jefferson.edu>
Subject: Re: Final Block 4B dissection materials

Thanks, Dr. Schmidt. I was trying to say that
If I have 1/10th of your expertise, then the incoming technology will be a piece of cake to you.
Yes, lots to learn for this paradigm shift. Lots.
Thanks.
Tayo.

From: Richard R. Schmidt <Richard.Schmidt@jefferson.edu>
Sent: Wednesday, May 27, 2020 10:00 AM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Subject: Re: Final Block 4B dissection materials

Tayo,
I attended the session as part of our training in this new technology. We are all supposed to become competent in these new approaches for our continuing course presentations and student interactions. Since I am not familiar with this technology I attended the sessions to gain more knowledge with regard to the same. There is a huge amount of learning we all must do. By the way, I am not the boss.

Kindest regards,
Dick

Sent from my iPhone

On May 22, 2020, at 1:17 PM, Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu> wrote:

Dear Dr. Schmidt,
Good afternoon.
May I ask why you participated at the just ended Visible Body Courseware Session.
You are the Boss .
May be you came in to help in case of any challenges!!!!
My regards.
Thanks.

Tayo.

From: Richard R. Schmidt <Richard.Schmidt@jefferson.edu>
Sent: Wednesday, April 1, 2020 12:43 PM
To: Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu>
Cc: Bruce Fenderson <Bruce.Fenderson@jefferson.edu>; Daniel F Jones <Daniel.Jones@jefferson.edu>; daniel.jones.md@gmail.com <daniel.jones.md@gmail.com>; Gary Lindenbaum <Gary.Lindenbaum@jefferson.edu>; Guiyun Zhang <Guiyun.Zhang@jefferson.edu>; Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>; Paul Howard <Paul.Howard@jefferson.edu>; Philip Marcucci <Philip.Marcucci@jefferson.edu>; richard schmidt <schmidtr705@gmail.com>; Sue Menko <Sue.Menko@jefferson.edu>
Subject: Re: Final Block 4B dissection materials

Thanks, Liz!

Sent from my iPhone

On Apr 1, 2020, at 9:34 AM, Elizabeth Spudich <Elizabeth.Spudich@jefferson.edu> wrote:

Good morning

I have attached the final PDFs for the "dissection" materials that are going out to the students in Block 4B. I would ask that you familiarize yourselves with the video series should any students contact you directly with questions

Thank you for all of your assistance with comments, edits and suggestions as these wer being constructed.

There is no word yet about timelines for the acquisition of any enterprise-wide cloud based 3D anatomy app. I will keep you all informed as things progress on that front

Liz-

Elizabeth A. Spudich, PhD
Assistant Professor
Dept. Pathology, Anatomy and Cell Biology
JeffMD Anatomy Thread Director
JeffMD Cardiopulmonary Block Co-Director
Sidney Kimmel Medical College
Thomas Jefferson University
215-503-4967/JAH 263D

"We are what we repeatedly do. Excellence, then, is not an act, but a habit."
- Aristotle

<04.10.20 ANAT_Dissect11_PeritonealCavity_Notes.pdf>

<04.09.20 ANAT_Dissect10_AntAbdWall_Inguinalpt2_Notes.pdf>
<04.07.20 ANAT_Dissect9_AntAbdWall_Inguinalpt1_Notes.pdf>
<04.13.20 ANAT_Dissect12_Viscera2_Notes.pdf>
<04.14.20 ANAT_Dissect13_Viscera3_Notes.pdf>
<04.16.20 ANAT_Dissect14_RetroPeritoneal_PostAbdWall_Notes.pdf>

EXHIBIT 31

Privileged

From: Karen Novielli <Karen.Novielli@jefferson.edu>
Date: Thursday, June 30, 2022 at 1:35 PM
To: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Subject: Re: My Take of the Zoomed Meeting of 6/21/2022

Dear Dr. Ariyo,

I am in receipt of your e-mail and summary statement. In my position of Vice Dean for Sidney Kimmel Medical College, I have had oversight of the promotions process in the medical college for at least the last 15 years and am very familiar with the qualifications for advancement. I would also note that Dr. Peiper also served on the committee for many years.

He and I were both involved in the discussions related to your promotion to Clinical Assistant Professor which was appropriately delayed to resolve concerns about your teaching effectiveness, the primary milestone for achievement of this rank. This issue does not warrant further debate or discussion.

Dr. Peiper and I have also discussed your request to be promoted to Clinical Associate Professor. In consideration of the milestones for promotion to Clinical Associate Professor, we have concerns about your ability to meet all of the milestones, most particularly the milestone for external service/impact. Nevertheless, and despite your imminent retirement, we are willing to put an application forward for promotion. Given the tone and content of your recent communications, however, any agreement to put forward an application for promotion must be contingent on your execution of a general release of claims against Jefferson and its employees. Additionally, you must understand that there can be no guarantees that your application will result in actual promotion. Your application, as with all

applications, will need to go through the appropriate committee process beginning with your departmental committee and culminating in approval by the Board of Trustees. If it is not approved at any level, it will not advance further. For many reasons, including time in rank and your recent and limited engagement in external activities in the area of external service/impact, you would not have been eligible for promotion at an earlier period. Regardless, backdating any promotion is not appropriate nor acceptable and in an effort to be completely clear, we will not agree to provide any additional compensation, as we believe you have been compensated fairly and equitably throughout your Jefferson employment.

Please let me know if you wish to move forward with the promotion process and I'll provide you with the necessary release document and, following your execution of that document, will coordinate your promotional application with the department.

Karen D. Novielli, MD
Vice Provost for Faculty Affairs
Thomas Jefferson University
Vice Dean for Faculty Affairs and Professional Development
Sidney Kimmel Medical College at Thomas Jefferson University
1020 Walnut Street, Suite 622
Philadelphia, PA 19107
215-955-2361 (phone)
karen.novielli@jefferson.edu

--

From: Olutayo Ariyo <Olutayo.Ariyo@jefferson.edu>
Date: Monday, June 27, 2022 at 10:36 PM
To: Karen Novielli <Karen.Novielli@jefferson.edu>
Cc: Stephen Peiper <Stephen.Peiper@jefferson.edu>
Subject: RE: My Take of the Zoomed Meeting of 6/21/2022

Dear Dr.Novielle,

Thank you for the zoomed Meeting of 6/21/2022.

Please find attached a letter that conveys my thoughts on this I had argued for a consideration to be promoted a Full Professor, but the University was only ready to promote me to the Associate Professor level.

Although I gave consent to the latter,, I hereby request and plead that such promotion should reflect some fairness as to when this was due with an adequate compensation attached.

Thanks.

Tayo.

NB:

Forwarded following after this is a copy of my 2015 Students Evaluation Report..

EXHIBIT 32

6 FACULTY TRACKS

The University offers both un-prefixed and prefixed faculty tracks. The University's six tracks illustrate its commitment to the varied educational and research needs of the Colleges. Faculty assignment to a track is determined by the Dean of the College or School outside of a College in consultation with the provost. Assignment to the Tenure Track requires the approval of the provost. Each college, in consultation with the provost, shall determine which tracks shall be operational in the college to best align faculty appointment and promotion criteria with the goals and objectives of the college.

6.1 UN-PREFIXED TRACKS

- a. Tenure Track – for faculty with a significant focus on research/scholarship/creative work, which requires demonstrated mastery, leadership, and sustained, enduring and impactful contributions over time with the additional requirement for significant contributions to and demonstrated excellence in the education and service missions of the institution. This track may require demonstrated excellence in the field of practice, as relevant to the discipline.
- b. Teacher Scholar Track – for faculty with a predominant focus on education, which requires demonstrated mastery, leadership, and impactful contributions over time with the additional requirement for significant contributions to and demonstrated excellence in the research/scholarship/creative work and service missions of the institution. This track may require demonstrated excellence in the field of practice, as relevant to the discipline.
- c. Clinical/Practice Scholar Track – for faculty with a predominant focus in the clinical learning environment or appropriate professional practice environment which requires demonstrated mastery, leadership, and impactful contributions over time with the additional requirement for significant contributions to and demonstrated excellence in the research/scholarship/creative work and service missions of the institution.

6.2 Prefixed Tracks

- a. Research Excellence Track – for faculty with predominant effort devoted to the research mission where excellence and leadership are expected. Contribution to the service mission is expected. Prefix: Research.
- b. Teaching Excellence Track – for faculty with predominant effort devoted to the teaching mission where excellence and leadership are expected. Contribution to the service mission is expected. Prefix: Teaching.
- c. Clinician/Practice Educator Track – for faculty with predominant effort devoted to the clinical learning environment or the teaching and learning in experiential professional

practice, where excellence and leadership are expected. Contribution to service mission is expected. The prefix is Clinical or Practice.

6.3 Time in Rank and Track

6.3.1 Time in Rank

Faculty advancement in rank is accompanied by the expectation of experience and maturation in the discipline in addition to specific criteria and guidelines for advancement. As a general matter, therefore, it is expected that faculty will have a minimum number of years in rank before consideration for promotion to the next rank. These minimal standards for years in rank are outlined below. In exceptional circumstances, and with approval of the Provost, faculty may be considered for promotion in rank without having achieved minimal time in rank. Minimal time in rank is measured from the actual date of the first appointment to the rank, whether at Jefferson or another institution.

Faculty in the un-prefixed tracks are expected to achieve advancement to the next rank within a specified time period. These “maximum years in rank” assure that faculty are attending to the expectations for career development inherent in the faculty’s assignment to an un-prefixed track. The specific maximum years in rank are shown in the table below.

6.3.2 Time-in-Rank and Time-in-Track Clock Start Date

For faculty in time-limited tracks and ranks, clocks begin on the October 1 following the official date of the appointment or promotion. To fulfill the expectation of the time in rank and track, a faculty member must be considered by their College Committee on Faculty Affairs in the academic year representing their maximum years in rank.

6.3.3 Promotion and Tenure Effective Dates

Given that promotion and tenure require Board of Trustees approval, the effective date of these personnel decisions will be the Board of Trustees meeting when the case was reviewed.

6.3.4 Time-in-Track ²

6.3.4.1 Un-prefixed tracks

The University has established time-in-rank and mandatory review processes for faculty on un-prefixed tracks, which are time-limited in nature.

² The information provided in this Section of the *TJU Faculty Handbook* is effective and applicable as of the effective date of the *Handbook*. Notwithstanding the foregoing sentence, some faculty members employed in faculty roles prior to the effective date of the *TJU Faculty Handbook* may, as a result of their date of employment and in the sole discretion of the Provost, be grandfathered under prior practices, particularly with respect to prior approaches to criteria and time requirements for promotion

TABLE 1 Time in Rank for Un-prefixed tracks

Track / Rank	Instructor	Assistant	Associate	Professor
Tenure	Min: 1 year	Min.: 4 years	Min.: 5 years	N/A
Teacher Scholar		Max: 8 years	Max: 10 years	
Clinical / Practice Scholar				

6.3.4.1 Time in Track: Tenure

As stated in the tenure policy, faculty on the tenure track must successfully achieve the award of tenure by the end of their fifth year as Associate Professor.

6.3.4.2 Prefixed tracks

Faculty on prefixed tracks are not subject to the maximum time in rank and may be reviewed for promotion in accordance with the policies and procedures for the specific track.

TABLE 2 Time in Rank for Prefixed tracks

Track / Rank	Instructor	Assistant	Associate	Professor
Research Excellence	Min.: 1 year	Min.: 4 years	Min.: 5 years	N/A
Teaching Excellence				
Clinician/ Practice Educator				

6.3.5 Extensions of the Time in Rank and Track for Eligible Reasons

Faculty on time-limited tracks must be considered for tenure/promotion within the timeframes specified in the applicable policies.

and tenure. In such cases, the University will clearly communicate the grandfathering decision and the prior practices that will control.

A faculty member may seek an extension of the promotion clock, as appropriate, one year per event if the faculty member demonstrates one or more of the following circumstances:

- Leave of absence for birth or adoption of a child or dependent care, as eligible under the Family Medical Leave Act and other Jefferson policies;
- Chronic serious medical circumstances of the faculty member or a serious medical circumstance of a family member;
- Personal or family tragedy;
- Material/significant/catastrophic change in the research environment, e.g., equipment, research data, animals, patients, or personal loss that significantly delays or terminates specific research activity.

A faculty member's promotion clock may be extended for up to two times for a cumulative maximum of two years.

Requests to extend the promotion clock are considered by the college dean and the Office of Faculty Affairs who make a recommendation to the provost.

6.3.6 Transfer between Tracks

Ordinarily, faculty remain on the track to which they are initially appointed.

Transfer to a tenure track or from a tenure track is considered an unusual occurrence and requires a recommendation from the dean and approval of the provost. A faculty member transferred from the tenure track to a non-tenure track may not transfer back to the tenure track. Similarly, a faculty member transferred to the tenure track from a non-tenure track, who is unsuccessful in achieving promotion or tenure within specified time frames, may not transfer to a non-tenure track.

With the approval of the dean, a faculty member in an un-prefixed (non-tenure) track may transfer to a prefixed track. A faculty member who is transferred from an un-prefixed track to a prefixed track may not transfer back to an un-prefixed track.

A faculty member who is being considered for transfer from a prefixed track to an un-prefixed track must meet criteria for the un-prefixed track as determined by the College's Faculty Affairs Committee and, as relevant, the University Committee on Appointment, Promotions, and Tenure.

As a general matter, change in a faculty member's track is equivalent to a change in the appointment and shall require fulfillment of the guidelines of an initial faculty appointment at the desired faculty rank including all relevant approvals. An individual may also seek approval for a track change at the time of promotion.

The successful conversion of a faculty member from one track to another does not create an open position.

6.3.7 Time in Rank and Track for Transfers

6.3.7.1 Transfer within un-prefixed tracks

An individual who is approved to transfer within Un-prefixed tracks carries their years in rank and track to the new track.

6.3.7.2 Transfer from a Prefixed Track to an Un-Prefixed track

An individual who is approved to transfer from a Prefixed Track to an Un- Prefixed Track may have up to five (5) years to achieve the expectations for promotion in rank, unless an extension is approved as further described in this *Handbook*.

6.4 Criteria for Rank and Track

The major criteria for faculty appointment and promotion to senior ranks in each of the tracks are contained in the tables that follow. Each college will provide guidelines as to how faculty demonstrate evidence of achievement for each criterion at each rank for the tracks in use in the college. Criteria and evidence of achievement for junior ranks in each track used by the college will be determined by the college. The guidelines for specific evidence of achievement for each rank and track in use in the college will be found in the college's addendum to the *Handbook*. All criteria and evidence of achievement are subject to change from time to time and to the approval of the provost.

TABLE 3 TENURE TRACK

Tenure Track Criteria	Professor	Associate Professor
Research/Scholarship /Creative Work	The candidate's portfolio of research/scholarship/creative work reflects persistence and significant, original, ongoing contributions to the discipline, and overall demonstrates enduring and measurable impact on the discipline as judged by academic leaders and recognized peers in the discipline.	The candidate's portfolio of original research/scholarship/ creative work provides a clear and defined contribution to the discipline and demonstrates focus and skill. While the candidate's portfolio of work may be considered "emerging" in the discipline, the contributions must be evaluated as meaningful by academic leaders and peers in the discipline.
Teaching/Education	The candidate demonstrates continued strength in teaching as evidenced by peer/supervisor/student evaluations, observations or awards and continued strong commitment to the educational mission including through ongoing improvement in pedagogy and teaching methods.	The candidate demonstrates strength in teaching as evidenced by peer/supervisor/ student evaluations, observations or awards. The candidate shows a strong commitment to the educational mission including by participating in ongoing improvement in pedagogy and teaching methods.
Institutional Service	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows a strong commitment to institutional service as evidenced, for instance, by effective contributions to program, college and/or university committees, and/or through institutional leadership roles. The candidate's record of contributions to the well-being and advancement of the university is considered outstanding.	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows strong commitment to institutional service as evidenced by effective contributions on program, college and/or university committees and clear contributions to the well-being and advancement of the university.
External Service/ Performance	The candidate has achieved a strong national (and international where appropriate) reputation for their contributions to the discipline and demonstrates ongoing service to the discipline as manifest, for instance, by continued invitations to serve in the activities of professional societies, to speak about the candidate's work, to participate in professional peer review activities or other similar accomplishments as appropriate for the discipline.	The candidate shows a strong commitment to service to the profession. The candidate is recognized as having an emerging national reputation in the discipline as demonstrated by activities that lead to advancement of the profession (such as participation in regional or national professional organizations, professional peer review activities, contribution to national meetings or other similar accomplishments as appropriate to the discipline).
Practical/ Clinical Mastery	If applicable, the candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field and, as applicable, maintenance of professional licensure or certification as described in the respective college's evidence of professional development.	If applicable, the candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field and, as applicable, maintenance of professional licensure or certification as described in the respective college's evidence of professional development.

TABLE 4 TEACHER SCHOLAR TRACK

Teacher Scholar Criteria	Professor	Associate Professor
Research/Scholarship /Creative Work	The candidate's portfolio of original research/ scholarship/creative work provides a clear and defined contribution to the discipline as judged by academic leaders and peers in the discipline, demonstrates focus and skill, and reflects sustained effort over time.	The candidate provides significant, original contributions to a portfolio of research/scholarship/creative work as judged by peers in the discipline.
Teaching/Education	The candidate demonstrates sustained excellence in teaching as evidenced by peer/supervisor/student evaluations, observations or awards and educational outcomes. The candidate shows strong commitment to the educational mission of the university, including through ongoing improvement in pedagogy and teaching methods, as well as contributions to pedagogy in the discipline as appropriate.	The candidate demonstrates excellence in teaching as evidenced by peer/supervisor/student evaluations, observations or awards and educational outcomes. The candidate shows strong commitment to the educational mission of the university, including through ongoing improvement in pedagogy and teaching methods, as well as contributions to pedagogy in the discipline as appropriate.
Institutional Service	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows a strong commitment to institutional service as evidenced, for instance, by effective contributions to program, college and/or university committees, and/or through institutional leadership roles. The candidate's record of contributions to the well-being and advancement of the university is considered outstanding.	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows a strong commitment to institutional service as evidenced by effective contributions on program, college and/or university committees and clear contributions to the well-being and advancement of the university.
External Service/ Performance	The candidate demonstrates clear prominence in their discipline at a national level (as manifested, for example, by invitations to speak at national forums, serve on national committees, and provide peer review or other similar accomplishments as appropriate for the discipline) and substantive service to the profession (as manifested, for example, by service on national committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).	The candidate demonstrates clear prominence in their discipline in (at minimum) local and regional arenas (as manifested, for example, by invitations to speak at local/regional forums, serve on local/regional committees, and provide peer review or other similar accomplishments as appropriate to the discipline) and service to the profession (as manifested, for example, by service on local/regional committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).
Practical/ Clinical Mastery	If applicable, the candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field and, as applicable, maintenance of professional licensure or certification as described in the respective college's evidence of professional development	If applicable, the candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field and, as applicable, maintenance of professional licensure or certification as described in the respective college's evidence of professional development

TABLE 5 CLINICAL/PRACTICE SCHOLAR TRACK

Clinical/Practice Scholar Criteria	Professor	Associate Professor
Research/Scholarship/Creative Work	The candidate's portfolio of original research/ scholarship/creative work provides a clear and defined contribution to the discipline as judged by academic leaders and peers in the discipline, demonstrates focus and skill, and reflects sustained effort over time.	The candidate provides significant, original contributions to a portfolio of research/scholarship/creative work as judged by peers in the discipline.
Teaching/Education	The candidate demonstrates sustained excellence in teaching as evidenced by peer/supervisor/student evaluations, observations or awards. The candidate shows strong commitment to the educational mission including through ongoing improvement in pedagogy and teaching methods.	The candidate demonstrates excellence in teaching as evidenced by peer/supervisor/student evaluations, observations or awards. The candidate shows strong commitment to the educational mission including through ongoing improvement in pedagogy and teaching methods.
Institutional Service	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows a strong commitment to institutional service as evidenced, for instance, by effective contributions to program, college and/or university committees, and/or through institutional leadership roles. The candidate's record of contributions to the well-being and advancement of the university is considered outstanding.	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows strong commitment to institutional service as evidenced, for instance, by effective contributions on program, college and/or university committees and clear contributions to the well-being and advancement of the university.
External Service/Performance	The candidate demonstrates clear prominence in their discipline at a national level (as manifested, for example, by invitations to speak at national forums, serve on national committees, and provide peer review or other similar accomplishments as appropriate for the discipline) and substantive service to the profession (as manifested, for example, by service on national committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).	The candidate demonstrates clear prominence in their discipline in (at minimum) local and regional arenas (as manifested, for example, by invitations to speak at local/regional forums, serve on local/regional committees, and provide peer review or other similar accomplishments as appropriate to the discipline) and service to the profession (as manifested, for example, by service on local/regional committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).
Practical/Clinical Mastery	The candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field. The candidate maintains professional licensure or certification, if applicable, as described in the respective college's evidence of professional development.	The candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field. The candidate maintains professional licensure or certification, if applicable, as described in the respective college's evidence of professional development.

TABLE 6 RESEARCH EXCELLENCE TRACK

Research Excellence Criteria	Professor	Associate Professor
Research/Scholarship/Creative Work	The candidate's portfolio of research/scholarship/creative work provides meaningful contribution to the field and demonstrates focus and skill. The portfolio of research/scholarship/creative work should demonstrate continued and increasing evidence of independence and leadership in addition to contributions to team and collaborative work.	The candidate provides significant contribution to a portfolio of research/scholarship/creative work in their field. The portfolio of research/scholarship/creative work should demonstrate evidence of independence and leadership in addition to contributions to team and collaborative work.
Teaching/Education	The candidate provides expert supervision to students and other trainees, as appropriate, and actively participates in the education of students and other trainees in the performance of the research/scholarship/creative work. Student and trainee evaluations of the faculty member reflect the skill and dedication of the faculty member.	The candidate provides expert supervision to students and trainees, as appropriate, and actively participates in the education of students and trainees in the performance of the research/scholarship/creative work. Student and trainee evaluations of the faculty member reflect the skill and dedication of the faculty member.
Institutional Service	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows a strong commitment to institutional service as evidenced, for instance, by effective contributions to program, college and/or university committees, and/or through institutional leadership roles. The candidate's record of contributions to the well-being and advancement of the university is considered outstanding.	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows strong commitment to institutional service as evidenced, for instance, by effective contributions on program, college and/or university committees and clear contributions to the well-being and advancement of the university.
External Service/Performance	The candidate demonstrates clear prominence in their discipline at a national level (as manifested, for example, by invitations to speak at national forums, serve on national committees, and provide peer review or other similar accomplishments as appropriate for the discipline) and substantive service to the profession (as manifested, for example, by service on national committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).	The candidate demonstrates clear prominence in their discipline in (at minimum) local and regional arenas (as manifested, for example, by invitations to speak at local/regional forums, serve on local/regional committees, and provide peer review or other similar accomplishments as appropriate to the discipline) and service to the profession (as manifested, for example, by service on local/regional committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).
Practical/Clinical Mastery	If applicable, the candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field and, as applicable, maintenance of professional licensure or certification as described in the respective college's evidence of professional development	If applicable, the candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field and, as applicable, maintenance of professional licensure or certification as described in the respective college's evidence of professional development.

TABLE 7 TEACHING EXCELLENCE TRACK

Teaching Excellence Criteria	Professor	Associate Professor
Research/ Scholarship /Creative Work	<p>While some level of contribution to research/scholarship/creative work may be expected, as appropriate to the college or program, all candidates must demonstrate a scholarly orientation to their practice and teaching. While it is recognized that contribution to one's field through research/scholarship/creative work is important and informs one's teaching and practice, greater emphasis is placed upon teaching excellence, institutional service, external service and practical mastery in this track.</p>	<p>While some level of contribution to research/scholarship/creative work may be expected, as appropriate to the college or program, all candidates must demonstrate a scholarly orientation to their practice and teaching. While it is recognized that contribution to one's field through research/scholarship/creative work is important and informs one's teaching and practice, greater emphasis is placed upon teaching excellence, institutional service, external service and practical mastery in this track.</p>
Teaching/ Education	<p>The candidate demonstrates sustained excellence in teaching as evidenced by peer/supervisor/student evaluations, observations or awards and educational outcomes. The candidate shows strong commitment to the educational mission of the university, including through ongoing improvement in pedagogy and teaching methods, as well as contributions to pedagogy in the discipline as appropriate.</p>	<p>The candidate demonstrates excellence in teaching as evidenced by peer/supervisor/student evaluations, observations or awards and educational outcomes. The candidate shows strong commitment to the educational mission of the university, including through ongoing improvement in pedagogy and teaching methods, as well as contributions to pedagogy in the discipline as appropriate.</p>
Institutional Service	<p>The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows a strong commitment to institutional service as evidenced, for instance, by effective contributions to program, college and/or university committees, and/or through institutional leadership roles. The candidate's record of contributions to the well-being and advancement of the university is considered outstanding.</p>	<p>The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows strong commitment to institutional service as evidenced by effective contributions on program, college and/or university committees and clear contributions to the well-being and advancement of the university.</p>
External Service/ Performance	<p>The candidate demonstrates clear prominence in their discipline at a national level (as manifested, for example, by invitations to speak at national forums, serve on national committees, and provide peer review or other similar accomplishments as appropriate for the discipline) and substantive service to the profession (as manifested, for example, by service on national committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).</p>	<p>The candidate demonstrates clear prominence in their discipline in (at minimum) local and regional arenas (as manifested, for example, by invitations to speak at local/regional forums, serve on local/regional committees, and provide peer review or other similar accomplishments as appropriate to the discipline) and service to the profession (as manifested, for example, by service on local/regional committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).</p>
Practical/ Clinical Mastery	<p>If applicable, the candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field and, as applicable, maintenance of professional licensure or certification as described in the respective college's evidence of professional development.</p>	<p>If applicable, the candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field and, as applicable, maintenance of professional licensure or certification as described in the respective college's evidence of professional development.</p>

TABLE 8 CLINICAL/PRACTICE EDUCATOR TRACK

Clinical/Practice Educator Criteria	Professor	Associate Professor
Research/Scholarship/Creative Work	While some level of contribution to research/scholarship/creative work may be expected, as appropriate to the college or program, all candidates must demonstrate a scholarly orientation to their practice and teaching. While it is recognized that contribution to one's field through research/scholarship/creative work is important and informs one's teaching and practice, greater emphasis is placed upon teaching excellence, institutional service, external service and practical mastery in this track.	While some level of contribution to research/scholarship/creative work may be expected, as appropriate to the college or program, all candidates must demonstrate a scholarly orientation to their practice and teaching. While it is recognized that contribution to one's field through research/scholarship/creative work is important and informs one's teaching and practice, greater emphasis is placed upon teaching excellence, institutional service, external service and practical mastery in this track.
Teaching/Education	The candidate demonstrates sustained excellence in teaching as evidenced by peer/supervisor/student evaluations, observations or awards. The candidate shows strong commitment to the educational mission including through ongoing improvement in pedagogy and teaching methods.	The candidate demonstrates excellence in teaching as evidenced by peer/supervisor/student evaluations, observations or awards. The candidate shows strong commitment to the educational mission including through ongoing improvement in pedagogy and teaching methods.
Institutional Service	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows a strong commitment to institutional service as evidenced, for instance, by effective contributions to program, college and/or university committees, and/or through institutional leadership roles. The candidate's record of contributions to the well-being and advancement of the university is considered outstanding.	The candidate is actively involved and accepts opportunities to serve the university and/or its colleges and programs. The candidate shows strong commitment to institutional service as evidenced, for instance, by effective contributions to program, college and/or university committees and clear contributions to the well-being and advancement of the university.
External Service/Performance	The candidate demonstrates clear prominence in their discipline at a national level (as manifested, for example, by invitations to speak at national forums, serve on national committees, and provide peer review or other similar accomplishments as appropriate for the discipline) and substantive service to the profession (as manifested, for example, by service on national committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).	The candidate demonstrates clear prominence in their discipline in (at minimum) local and regional arenas (as manifested, for example, by invitations to speak at local/regional forums, serve on local/regional committees, and provide peer review or other similar accomplishments as appropriate to the discipline) and service to the profession (as manifested, for example, by service on local/regional committees, provision of peer review, or other similar accomplishments as appropriate for the discipline).
Practical/Clinical Mastery	The candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field. The candidate maintains professional licensure or certification, if applicable, as described in the respective college's evidence of professional development.	The candidate demonstrates mastery and leadership in the discipline manifested in sustained, high-quality practice in the field. The candidate maintains professional licensure or certification, if applicable, as described in the respective college's evidence of professional development.

While more than one appointment may be held, one appointment shall be designated as primary. Any contractual commitments to the faculty member, including tenure and consideration for promotion, shall apply only to the primary appointment.

Requests for more than one secondary appointment require the approval of the provost.

See Appendix I, for the procedures for a secondary appointment.

7.4 Resignation

Faculty members shall inform their Department Chairperson or College/School dean in writing of their intention to retire or resign at least ninety (90) days in advance of the proposed resignation date. When possible, the effective date of resignation shall coincide with the end of the academic year. Failure to provide this ninety (90) day notice period shall result in forfeiture of any accrued unused vacation time otherwise payable in accordance with applicable University policy.

7.4.1 Clinical Faculty Employed by Jefferson University Physicians (JUP)

In addition to the above, JUP participants intending to retire or resign their participation in JUP must give six (6) months' notice in writing to the Department Chair and President of JUP in order to be eligible to receive clinical incentive compensation with respect to any period prior to their separation from JUP.

7.5 Notice of Non-reappointment

From time to time, the university may decide to separate an employed faculty member on grounds other than "cause." The university may make such a decision based, by way of example only, on financial or other business considerations, performance concerns, or personal conduct that does not warrant dismissal for cause. The non-reappointment process is subject to oversight by the Office of the Provost. Non-reappointment of employed faculty requires approval by the provost or designate, in consultation with the Department of Human Resources. Failure to reappoint does not constitute a dismissal for cause. Requirements for advanced notice of non-renewal of the appointment are described in the *Bylaws of the Schools and Colleges of Thomas Jefferson University*.

8 PROCEDURES FOR FACULTY APPOINTMENT AND PROMOTION

8.1 Overview of Jefferson's Appointment, Promotion, and Tenure Tracks and Guidelines

Jefferson's appointment, promotion, and tenure systems are intended to facilitate continued career growth and professional success throughout the continuum of a faculty member's career, and, in turn, enable the success of each of the colleges and the university. A thriving and successful faculty is essential for the university to fulfill its mission to improve the lives of its students, patients and the greater society. Further, Jefferson's appointment, promotion and tenure systems are aligned with the university's desire to provide a culture that promotes excellence in achievement and the life-long professional growth and personal wellness of its

8.3 General Considerations

General Considerations for College Committees on Faculty Affairs and the University Committee on Faculty Appointments, Promotion, and Tenure considering candidates for faculty appointment, promotion and, where applicable, tenure include the following:

1. Teaching, scholarly achievement, service (both to the institution and to the profession), and integrity (both personal and professional) are core values of the University and, consistent with specific rank and track requirements, should each be independently considered and evaluated in appointment, promotion, and tenure recommendations.
2. Promotion and tenure criteria should encourage the scholarly, creative, and innovative work of the faculty which should be evaluated on the **impact** of the work, as judged by peers in the field or other appropriate mechanism.
3. The University accepts a broad definition of scholarship, which includes the scholarship of discovery, application, integration, and education for consideration in faculty appointment, promotion, and tenure recommendations. Innovations in the field should be encouraged and will be assessed by discipline-specific peers or other appropriate mechanism based upon impact in the field.
4. In parallel with individual achievement, collaborative work among the faculty within and between disciplines is encouraged and should be appropriately considered in appointment, promotion, and tenure considerations. The faculty member has the responsibility of documenting their contribution to collaborative scholarship.
5. All methods of teaching (including clinical, studio, lab, and classroom) as well as all modes (including face-to-face, on-line, and hybrid) are recognized as fulfilling teaching responsibilities.
6. Contributions to education should be evaluated by the college with consideration of the faculty member's effort devoted to and opportunities to participate in the educational mission of the program, department, and/or the college. The University recognizes that educational missions may vary greatly between colleges and within a college.
7. Service to the faculty member's program/department/college/University is essential and expected of all faculty members. Service activity should increase in type, volume, leadership, and visibility as the faculty member progresses in their career.
8. Formal administrative roles and assignments may contribute to the expectation of service to the institution.
9. While all criteria must be met when considering applications for appointment, promotion, and tenure, an evaluation committee may give consideration to the allocation of a faculty member's effort when judging contributions in each area.
10. The criteria of adherence to high ethical and moral standards in the performance of professional duties, including adherence to the Code of Conduct and other University policies, and a record of conduct that upholds the core values of the

institution should be assessed as part of all faculty appointment, promotion, and tenure decisions.

8.4 Expected Review of Faculty on Un-Prefixed Tracks

Jefferson is committed to a system of review and feedback to foster faculty achievement of track-specific career development milestones. In addition to adhering to the requirement for annual performance evaluation of faculty, each college is expected to provide formal periodic review of full-time faculty in un-prefixed tracks through a process developed by its Faculty Affairs Committee in consultation with the dean. Formal periodic review of full-time faculty in un-prefixed tracks should occur at the following intervals:

Assistant Professor: In the third year following appointment and in the sixth year following appointment, if not already promoted (or in the process thereof).

Associate Professor: In the fourth year following appointment and in the eighth year following appointment, if not already promoted (or in the process thereof).

This review process is overseen by the Office of Faculty Affairs and Professional Development.

8.5 Process for Initiation of Faculty Appointment/Promotion/Tenure or Track Change

A request for a new faculty appointment, promotion, tenure, or track change starts with a recommendation from the faculty member's supervisor to the dean of the college or school outside of a College. If the dean of the college or school outside of a college recommends the action, the application will be forwarded to the Faculty Affairs Committee of the college or school outside of a college for consideration (except for requests for appointment or transfer to the tenure track, which must receive approval of the provost before going to the Faculty Affairs Committee). If the Faculty Affairs Committee recommends the candidate, the application is forwarded to the Executive Committee of the college or school outside of a college. If appropriate (such as the promotion to Senior Faculty or Tenure), the application is also reviewed by the University Committee on Faculty Appointments, Promotion and Tenure. Final approval of recommended actions for faculty appointment, promotion, tenure or track change is provided by the Board of Trustees.

In cases where a faculty member has reached the maximum allowable time in rank for consideration of promotion or tenure in time limited tracks, the supervisor must either recommend the faculty member for the promotion or for tenure, as applicable, recommend a change in track, as detailed herein, or initiate the process for providing notice of non-renewal of appointment as provided for in the *Bylaws of the Schools and Colleges of Thomas Jefferson University*. A faculty member whose employment has been extended beyond the maximum time for promotion or tenure as a result of the required notice of non-renewal of appointment, will not be considered in violation of the *TJU Faculty Handbook*.

8.6 Procedures for Faculty Appointment/Promotion/Tenure or Track Change

The procedures for faculty appointment, promotion, tenure, and/or track change will be developed by each college in consultation with the Office of Faculty Affairs and Professional Development and detailed in each college's addendum to the *Handbook*. Each college must develop a process for solicitation of external refereed letters for the evaluation of faculty for appointment or promotion to senior faculty ranks and/or tenure that is independent of the candidate being considered for appointment or promotion to a senior rank or for tenure. While it is permissible for the candidate to provide the names of potential referees, the decision as to which referees are used and the solicitation of the letters must be done independent of the candidate.

Refer to Appendix I for further instructions on the solicitation and qualifications of external reviewers for faculty candidates for appointment or promotion to senior ranks and for tenure.

9 FACULTY TENURE

9.1 Tenure Policies and Procedures

9.1.1 Preamble to the TJU Tenure Policy

Universities have a unique obligation in society to support the advancement of knowledge unfettered by other considerations. Therefore, Thomas Jefferson University ("Jefferson") is committed to fostering advancement of knowledge in its academic disciplines and supports a faculty appointment, promotion, and tenure system that appropriately recognizes the research, scholarship, and creative work of the faculty that lead to substantive, enduring, and transformative impact in these disciplines.

To facilitate the advancement of knowledge, Jefferson accepts a broad definition of scholarship that includes the advancement, transformation, and/or translation of knowledge by the application of one's intellect in an informed, disciplined, and creative manner. Such research, scholarship and creative work should be communicated broadly or made public in discipline-appropriate ways; subject to external, discipline-specific peer review; and should ultimately be judged on the impact of the work on the discipline as described by peers. With this in mind, faculty are encouraged to think and act creatively in their academic and scholarly pursuits.

At Jefferson, while independent achievements serve as the foundation of evaluation for promotion and tenure, the importance of contributions to collaborative work is valued, encouraged, and considered in the appointment, promotion, and tenure processes. Additionally, innovative approaches to work and contributions to the disciplines are valued, encouraged, and considered in the appointment, promotion, and tenure processes.

While substantive achievements in research, scholarship, and creative work are necessary for the consideration and award of tenure, they are not sufficient. The tenured faculty

EXHIBIT 33

**Guidelines for Ranks in Research Track
Non-Tenure Eligible**

Edition: 9/05

	Research Instructor Appropriate terminal degree for appointment	Research Assistant Professor Appropriate terminal degree for appointment	Research Associate Professor Appropriate terminal degree for appointment	Research Professor Appropriate terminal degree for appointment
Credentials				
Research		Documentation of a key role in a research program to which the faculty member makes significant scientific contributions	Growth as an investigator in focused research activities as evidenced by a key collaborative role in one or more research programs to which the faculty member contributes important independent scientific expertise or as evidenced by establishment as an independent investigator through securing internal or external funding for research	Sustained, focused research activities as documented by a continued collaborative role in one or more research programs to which the faculty member contributes critical independent scientific expertise or by securing continued external, peer-reviewed funding for the applicant's independent research program
Leadership			Evidence of a developing national reputation as a researcher as evidenced by invited participation at national and international scientific conferences, invited lectures and seminars, service on national scientific committees, service as a peer reviewer for journals or grant review panels, etc.	Evidence of national and/or international recognition of scholarly achievements as evidenced by invited participation on study sections or review boards, membership on editorial boards or national scientific committees, honors and awards, directive roles in national or international meetings, and/or selection as a distinguished lecturer

**Guidelines for Ranks in Research Track
Non-Tenure Eligible**

Edition: 9/05

Scholarship	Research Instructor	Research Assistant Professor	Research Associate Professor	Research Professor
		Documentation of scholarship as evidenced by a minimum of four peer-reviewed research publications as author or co-author	Documentation of scholarship as evidenced by contribution to peer-reviewed research publications. Publications will be evaluated for quality and impact. Where possible, candidates should provide information about an article's citation rate, and the impact and ranking of the journal in which it was published. If the applicant is not first or senior author, he/she should briefly state their contribution to the paper. Though there is not a set number of publications required, a minimum productivity of 1 to 2 papers per year is expected	Documentation of scholarship as evidenced by major contribution to peer-reviewed research publications. Publications will be evaluated for quality and impact. Where possible, candidates should provide information about an article's citation rate, and the impact and ranking of the journal in which it was published. If the applicant is not first or senior author, he/she should briefly state their contribution to the paper. Though there is not a set number of publications required, a minimum productivity of 1 to 2 papers per year is expected
			Documentation of service to the University	Evidence of substantial service to the University as evidenced by a leadership role on a committee or task force or through active involvement in University Committees.
				Evidence of active mentoring of junior faculty as attested to by the Chair and at least one junior faculty whom the faculty member has mentored
Letters of Recommendation	Two letters of recommendation from faculty at Associate Professor level or higher attesting to the professionalism, competence as a researcher and suitability for an academic career	Two letters of recommendation from faculty at Associate Professor level or higher attesting to the professionalism, competence as a researcher and potential for developing as an independent researcher	Letters from at least three experts in the applicant's field of scientific expertise, external to the University and its affiliates, who hold the rank of Associate Professor or higher attesting to the professionalism and scientific contributions of the faculty member supporting the rank of Research Associate Professor	Letters from at least four experts in the applicant's field of scientific expertise, external to the University, who hold the rank of Professor or its equivalent, including at least two letters from individuals who have neither mentored nor collaborated with the candidate, attesting to the individual's

Guidelines for Ranks in Research Track
Non-Tenure Eligible

Edition: 9/05

			professionalism and scientific contributions supporting the rank of Research Professor.
Letter from Chair discussing career development plan for applicant including plans to develop independence in research	Letter from Chair discussing career development plan for applicant including progress in developing an independent research program		
Minimal time in rank 1 year	Minimal time in rank 4 years	Minimal time in rank 5 years	

EXHIBIT 34

Guidelines for Ranks in Clinical and Educational Scholarship Track
(Tenure eligible track for faculty who are full time employees of the University)

Edition: 7/10

SKMC strongly encourages interdisciplinary and inter-institutional collaborative research as it considers this collaborative research to be essential to advancing biomedical science and patient care. As such, in the evaluation of a candidate for faculty appointment or promotion, the participation of a faculty member in interdisciplinary and inter-institutional collaborative basic, translational or clinical research, where the faculty member has a significant leadership role that is integral to the project, this effort will be considered equivalent to that of a principal investigator in an independent research project when considering criteria for appointment or promotion. An example of a project role that is equivalent to a principal investigator in an independent research project includes serving as a project director on a programmatic grant such as an NIH PO-1, U-19 or CTSA. In general, these integral roles will be considered for all levels of faculty. Evidence of this type of collaboration in grants and their resulting peer reviewed publications will be given equal weight in the consideration of metrics for appointment and promotion as that of independent investigator roles in grants and publications.

	Instructor	Assistant Professor	Associate Professor	Professor
Credentials	Appropriate terminal degree for appointment Evidence of appropriate, current credentials (board certification and recertification as appropriate)	Appropriate terminal degree for appointment Evidence of appropriate, current credentials (board certification and recertification as appropriate)	Appropriate terminal degree for appointment Evidence of appropriate, current credentials (board certification and recertification as appropriate)	Appropriate terminal degree for appointment Evidence of appropriate, current credentials (board certification and recertification as appropriate)
Education	Current role (>20 hrs/year) in education of TJU students or other trainees Educational portfolio demonstrating proficiency in teaching	Current role (>20 hrs/year) in education of TJU students or other trainees. Educational portfolio demonstrating excellence in teaching	Current role (>20 hrs/year) in education of TJU students or other trainees. Educational portfolio demonstrating excellence in teaching	Current role (>20 hrs/year) in education of TJU students or other trainees Educational portfolio demonstrating excellence in teaching
Clinical Service*	Clinical Excellence as demonstrated by reputation among peers and patient outcomes	Clinical Excellence as demonstrated by reputation among peers and patient outcomes	Clinical Excellence as demonstrated by reputation among peers and patient outcomes	Clinical Excellence as demonstrated by reputation among peers and patient outcomes
Leadership	Defined significant role in research, education or clinical care program with demonstration of appropriate preparation for that role (training in research, clinical program or clinical trials administration or educational methods as appropriate)	The applicant must demonstrate an evolving leadership role in the applicant's chosen area of emphasis and demonstrate superior outcomes associated with that role. For applicants with significant roles in more than one area of academic emphasis, expectations should reflect apportioned time and effort, but in aggregate should reflect the accomplishments of others at the Associate Professor Rank	The applicant must demonstrate a leadership role in the applicant's chosen area of emphasis and demonstrate superior outcomes associated with that role. For applicants with significant roles in more than one area of academic emphasis, expectations should reflect apportioned time and effort, but in aggregate should reflect the accomplishments of others at the Professor Rank	The applicant must demonstrate a leadership role in the applicant's chosen area of emphasis and demonstrate superior outcomes associated with that role. For applicants with significant roles in more than one area of academic emphasis, expectations should reflect apportioned time and effort, but in aggregate should reflect the accomplishments of others at the Professor Rank

Guidelines for Ranks in Clinical and Educational Scholarship Track
(Tenure eligible track for faculty who are full time employees of the University)

Edition: 7/10

Instructor	Assistant Professor	Associate Professor	Professor
		<p>1. Research Focus – role as independent investigator or significant collaborator in an independent project. The research team should demonstrate the ability to compete for external peer-reviewed funding.</p> <p>2. Education focus—demonstrate leadership role (responsibility for a defined portion of a curriculum in medical student, resident or peer education) and superior outcomes (relevant to expected outcomes) for the educational program which must be rated as excellent to outstanding (consistently above acceptable) by peers and learners; the applicant must demonstrate evidence of continuous quality improvement of the educational program.</p> <p>3. Clinical focus – demonstrate leadership role and superior outcomes in a clinical program including implementation and evaluation of QI initiatives.</p> <p>4. Clinical investigation – leadership role in clinical trial activities with demonstration of independent scholarly contribution resulting from these activities. Trial activities should be focused and coincide with clinical area of expertise.</p>	<p>1. Research Focus – role as independent investigator or significant collaborator in an independent project. The research team should demonstrate the ability to compete for external peer-reviewed funding.</p> <p>2. Education focus—demonstrate leadership role (responsibility for a defined portion of a curriculum in medical student, resident or peer education) and superior outcomes (relevant to expected outcomes) for the educational program which must be rated as excellent to outstanding (consistently above acceptable) by peers and learners; the applicant must demonstrate evidence of continuous quality improvement of the educational program.</p> <p>3. Clinical focus – demonstrate leadership role and superior outcomes in a clinical program including implementation and evaluation of QI initiatives.</p> <p>4. Clinical investigation – leadership role in clinical trial activities with demonstration of independent scholarly contribution resulting from these activities. Trial activities should be focused and coincide with clinical area of expertise.</p>

Guidelines for Ranks in Clinical and Educational Scholarship Track
(Tenure eligible track for faculty who are full time employees of the University)

Edition: 7/10

Instructor	Assistant Professor	Associate Professor	Professor
		<p>Evidence that the applicant has a strong regional or national reputation as evidenced by invitations to speak, service on regional or national committees or task forces, serving as journal peer reviewer, etc.</p>	<p>The applicant must be recognized as a national or international leader and scholar in the area of academic focus as demonstrated by service to related national organizations and committees, invited lectureships, membership on editorial boards, expert review panels, accreditation teams etc.</p>
	<p>Demonstration of capacity for scholarship as evidenced by significant contribution to a minimum of two scholarly products. Multiple forms of scholarship as defined by Boyer are acceptable; however, they should meet criteria for scholarship, as defined by Glassick, and closely correspond to the applicant's chosen area of academic emphasis. For instance, faculty with a focus on research should publish findings in peer reviewed research journals and present findings to appropriate audiences; faculty with a defined area of clinical expertise can publish state-of-the-art clinical care reviews through book chapters or topic review articles, disseminate results of quality improvement projects to appropriate audiences or participate in rigorous peer-reviewed educational programs; and faculty with an emphasis in education can develop educational products that are widely adopted, publish the results of educational research, or contribute broadly to educational efforts through book chapters, topic review articles, or other appropriate peer-reviewed educational venues</p>	<p>Expectations for scholarship are defined under Assistant Professor rank and should coincide with the academic focus and time and effort allocations of the individual; however, on average, a minimum of one appropriate scholarly product annually is expected</p>	<p>Expectations for scholarship are defined under Assistant Professor rank and should coincide with the academic focus and time and effort allocations of the individual; however, on average, a minimum of one appropriate scholarly product annually is expected</p>

Scholarship

Guidelines for Ranks in Clinical and Educational Scholarship Track
(Tenure eligible track for faculty who are full time employees of the University)

Edition: 7/10

Instructor	Assistant Professor	Associate Professor	Professor
		Evidence of service to the University	Evidence of significant service to the University as evidenced by leadership role or sustained commitment to a University Committee or activity
			Evidence of active mentoring of junior faculty as attested to by Chair and at least one junior faculty whom the faculty member has mentored

Service to the University

Guidelines for Ranks in Clinical and Educational Scholarship Track
(Tenure eligible track for faculty who are full time employees of the University)

Edition: 7/10

Letters of Recommendation				
	Instructor	Assistant Professor	Associate Professor	Professor
	Two letters of recommendation from faculty at Associate Professor level or higher attesting to professionalism, competence in clinical care*, suitability for a role in an educational program and planned area of academic focus	Two letters of recommendation from faculty at the Associate Professor level or higher attesting to professionalism, clinical* and teaching excellence and capacity for scholarship are required	Letters from at least three experts in the applicant's field, external to the University and its affiliates, who hold the rank of Associate Professor or higher and can attest to a strong regional or national recognition of the individual's accomplishments in clinical care*, education and scholarship	Letters from at least four experts in the applicant's field, external to the University and its affiliates, who hold the rank of Professor and can attest to national or international recognition of the individual as a leader and scholar in the identified area(s) of academic focus
	Letter from Chair discussing career development plan for applicant including plans to develop focus for scholarship	Letter from Chair with career development plan detailing applicant's evolving academic roles and plans for continued development and scholarship justifying an appointment in the Clinical and Educational Scholarship Track		

Minimal time in rank 1 year
Maximal time in rank 5 years

Minimal time in rank 4 years
Maximal time in rank 10 years

Minimal time in rank 5 years
Maximal time in rank 12 years

*Clinical Service requirement for faculty involved in patient care activities

EXHIBIT 35

Guidelines for Ranks in Clinician Educator Track

Edition: 9/05

	Clinical Instructor	Clinical Assistant Professor	Clinical Associate Professor	Clinical Professor
Credentials	Appropriate degree for appointment	Appropriate terminal degree for appointment (MD degree or equivalent)	Appropriate terminal degree for appointment (MD degree or equivalent)	Appropriate terminal degree for appointment (MD degree or equivalent)
	Evidence of appropriate current credentials for position (board certification and recertification as appropriate)	Evidence of appropriate current credentials for position (board certification and recertification as appropriate)	Evidence of appropriate current credentials for position (board certification and recertification as appropriate)	Evidence of appropriate current credentials for position (board certification and recertification as appropriate)
	Current role (>20 hrs/year) in education of TJU students or other trainees	Current role (>20 hrs/year) in education of TJU students or other trainees	Current role (>20 hrs/year) in education of TJU students or other trainees	Current role (>20 hrs/year) in education of TJU students or other trainees
Education		Educational portfolio demonstrating proficiency in teaching	Educational portfolio demonstrating sustained, excellent teaching evaluations and evidence of continued development of pedagogical skills (four hours per year)	Educational portfolio demonstrating sustained, superior teaching evaluations and evidence of continued development of pedagogical skills (four hours per year)
		Evidence of attainment of pedagogical training (10 hours or more)		
		Clinical Excellence as demonstrated by reputation among peers and patient outcomes	Clinical Excellence as demonstrated by reputation among peers and patient outcomes	Clinical Excellence as demonstrated by reputation among peers and patient outcomes
Clinical Service				
Leadership			Reputation for clinical expertise beyond TJU and its affiliates as evidenced by invitations to write or speak on area of clinical focus	Evidence of national or international reputation for clinical expertise as evidenced by invited lectureships, service on national committees, task forces, editorial boards, etc.

Guidelines for Ranks in Clinician Educator Track

Edition: 9/05

	Clinical Instructor				Clinical Assistant Professor		Clinical Associate Professor		Clinical Professor	
	Evidence of significant service to the University as evidenced by leadership role or sustained commitment to a University Committee or activity				Evidence of active mentoring of junior faculty as attested to by Chair and at least one junior faculty whom the faculty member has mentored		Evidence of service to the University		Evidence of significant service to the University as evidenced by leadership role or sustained commitment to a University Committee or activity	
Service to the University										
Letters of Recommendation	Two letters of recommendation from faculty at Associate Professor level or higher attesting to professionalism, clinical competence, commitment to educational program				Two letters of recommendation from faculty at Associate Professor level or higher attesting to professionalism, clinical excellence, commitment and effectiveness as a teacher		Letters from at least three experts in the applicant's field, external to the University and its affiliates, at the rank of Associate Professor or higher attesting to the applicant's professionalism, reputation for outstanding clinical care, and educational contributions		Letters from at least four experts in the applicant's field, external to the University and its affiliates, who hold the rank of Professor attesting to the applicant's professionalism, national or international reputation and associated contributions related to expertise in a clinical domain, and contributions as an educator which must be rated as outstanding	
	Minimal time in rank 1 year				Minimal time in rank 4 years		Minimal time in rank 5 years			

EXHIBIT 36

From: [Olutayo Ariyo](#)
To: [PDOContact](#)
Cc: [Olutayo Ariyo](#)
Subject: Olutayo Ariyo MBBS., MBA Vs THOMAS JEFFERSON UNIVERSITY PHILADELPHIA PA 19107
Date: Saturday, April 1, 2023 4:16:56 PM
Attachments: [CV CV 12 27.docx](#)
[XXX 4 1 TAYO ARIYO MBBS., MBA VS THOMAS JEFFERSON UNIVERSITY PHILADELPHIA PA..docx](#)

You don't often get email from tmajor33@hotmail.com. [Learn why this is important](#)

CAUTION: The sender of this message is external to the EEOC network. Please use care when clicking on links and responding with sensitive information. Forward suspicious emails to phishing@eeoc.gov.

[4 1 2023 EEOC DOCUMENTS 3 24 23 \[Autosaved\].pptx](#)

TO EEOC.

MY Case was that of an Academic Career dislocated, scuttled, educationally and financially exploited, other colleagues with less experience, less scholarly outputs to show for but are in accelerated promotions. Seems at TJU in the Education Track, all you need to do to get promoted is to rely on positive STUDENTS evaluations. I had many, but in addition a proud scholarly records despite all weapons fashioned.

International Recognitions not required until seeking the FULL PROFESSOR Rank. I was regularized as a FORMAL FACULTY IN 2013/14. Same year I started earning International Recognitions. A colleague of mine is Dr. Zhang, with no invitations except to America Association of ANATOMY (AAA), while my invitations were as diverse ranging from

American Association of Clinical Anatomists

European

AS

British

ANZ .

What is in the mind of TJU that they have concerns over teaching effectiveness in a Faculty, but this Faculty was made the Director at the highest level of Anatomy Teaching iAnatomy-Surgical Anatomy in Head and Neck to Residents in ent, Maxillofacial, Dermatology and Otolaryngology teaching receiving perfect Scores 10/10 in Evaluations from these Residents. Somewhere, somehow, the truth is not being told.

I am respectfully requesting EEOC issue /grant me the right to sue letter to seek redress for these litany of harm, discriminations, misdesignations, in the delay and denying me well earned significant Status of FULL Professor., I have attached many Exhibits to support my claims and look forward to be invited for an Interview soon, taking into consideration that I initially submitted my Complaints to EEOC on 12/28/2022. I am fully rejecting the arm twisting or intimidation of a promotion even to a lower Status of the Associate Professor less that that of FULL Professor that had to be contingent to giving up my rights. I have an HONOR to

preserve and a tainted porridge is not an enticement to warrant me giving up my rights to seek redress for ruinage of a brilliant academic career I am ready to defend before an unbiased group of chosen experts in the field of Human Anatomy, worldwide.

Thanks.

Sincerely,

Olutayo Ariyo MBBS, MBA

Date Prepared 6/30/2022
Name: Olutayo Ariy0

Home Address: 1016 Yeadon Avenue
 Yeadon, PA.19050
Phone (610) 931-7383 (C)
E-Mail: tmajor33@hotmail.com

Place of Birth: Iju-Nigeria

Education

Year	Degree	Field of Study	Institution
1980	MBBS	Medicine	University of Ibadan
1986-1991	Fellow	Developmental Embryology	University of Pennsylvania
2002	MBA	Business	Temple University

Postdoctoral Training

Month/Years	Title	Specialty /Discipline	Institution
06/81-05/81	Internship	Medicine and Surgery Pediatrics, OB/GYN	Obafemi Awolowo University Teaching Hospital
09/86-0/591	Medical Trainee	Developmental Biology	University of Pennsylvania

Faculty Academic Appointments

Month/Years	Title	Department	Institution
07/82- 08/86 1987-1991	Lecturer II	Anatomy/Embryology Instructor in Anatomy	Obafemi Awolowo University University of Pennsylvania
06/15- 06/18/2018-	Clinical Instructor	Human Anatomy	SKMC at Thomas Jefferson University
06/19/2018.	Clinical Assistant Professor	Anatomy.	SKMC at Thomas Jefferson University, Philadelphia PA

Other Professional Positions

Month/Years	Position Title	Department	Institution
06/82- 08/82	Physician	College Health Center	Obafemi Awolowo University

1986-1992	Instructor	University of Pennsylvania
06/84-08/86	Physician I/C	College Health Center
1986-1992	Instructor in Anatomy	Oyo College of Education ,
1992-1995	Instructor in Anatomy	University of Pennsylvania
1995-2004	Part Time Lecturer in Anatomy	Temple School of Podiatry
2005-2013	Research Associate 1	Thomas Jefferson University
3/2017-6/22017	Adjunct Professor	Thomas Jefferson University
Committee Service		
		UPENN Dental School

Years of Membership Name of Committee

Honors and Prizes

Year	Name of Honor	Awarding Organization	Achievement awarded for
09/87-09/90	Top 3 Instructors in	Anatomy Dept. UPENN	Teaching excellence as Top quadrant Instructor In Gross Anatomy
06/2016		AACA	JUDGE
06/2021		AACA	Invitation as JUDGE to determine Best Student Oral Presentation For MERIT Award
YR 2916/17		Thomas Jefferson University	Recognition as Best in Teaching CLINICAL ANATOMY.TJU officially allotted 1 hour Review of Clinical Anatomy week preceeding exams

Report of Local Teaching and Training

Teaching of Students in Courses:

Year (s)	Course Title Type of Student/Audience	Location Level of Effort
1982-1986	The Human Body 1 st year medical students	Obafemi Awolowo University 4-hours weekly for 9 months

1886-1991	Human Anatomy 1 st year medical students	University of Pennsylvania 9 –hours weekly for 3 months
1993-2005	Human Anatomy	Thomas Jefferson University
2005- 2013	Human Anatomy 1 st year medical students	Thomas Jefferson University 9-hours weekly for 3 months
	Microscopic Anatomy 1 st year medical students	Thomas Jefferson University 8-hours weekly for 3 months'
	Neurosciences 1 st Year medical students	
2005- 2016	Human Anatomy 1 st year PT students	Thomas Jefferson University 9-hour weekly for 4 months
Yr 2019/2920		

Report of Local Teaching and Training (continued)

Year (s)	Course Title Type of Student/Audience	Location Level of Effort
2005 - 2017	Human Form and Development 1 st year medical students	Thomas Jefferson University 9-hours weekly for 3 months
	Human Form and Development 1 st year PT students	Thomas Jefferson University 9 hours weekly for 4 months
	Human Form and Development 1 st year PA students	Arcadia University 9-hours weekly for 10 weeks
	Microscopic Anatomy 1 st year medical students	Thomas Jefferson University 8- hours weekly for 10 weeks
	Neurosciences 1 st year medical students	Thomas Jefferson University 6-hours weekly for 3 months
	Microscopic Anatomy	Thomas Jefferson University 8-hours weekly for 3 months

Formal Teaching of Residents

Year (s)	Subject	Location
	Type of Student/Audience	Level of Effort
2014-6/30/2022	COURSE DIRECTOR	
	HEAD AND NECK	
	SURGICAL ANATOMY	
2013 20/21-t	Head and Neck Anatomy	
	Residents in	Thomas Jefferson Hospital Service.
	ENT, Dermatology	4-hours weekly (class & lab)
	Maxillo-facial	for 5 weeks.
	Otolaryngology	
2017- 6/30/2022	Human Anatomy	JeffMD program/ Lab
	Microscopic Anatomy	JeffMD program/Lab
	Neuroscience	JeffMD program /Lab
2020- 06/2022	COURSE DIRECTOR.	Elective Course in Advanced
	Anat.404	Anatomy
		Year 4 Graduating Class

Advising and Mentoring

Year(s)	Audience/Location	Assessment
2013- 2017	44 1 st year medical students	Triaging and measurably.
Thomas Jefferson University		improved academic performance
2016- 06/2022	1 st year PA students	Triaging and measurably
	Thomas Jefferson University	improved academic performance
2017- 06/2922	About 40 1 st Tear JeffMD	Triaging and measurably
	Assigned Students	improved academic performance
2017-06/2022	About 10 Jeff PA assigned students	Triaging and measurably
		improved academic performance

Report of International Invited Presentations

Year	Presentation Topic	Location
1987	Fertilization and Zygote Formation	Obafemi Awolowo University
2008	Aberrant arterial Vessels of the Upper Limb	Obafemi Awolowo University

Report of Teaching and Educational Innovations

Teaching/Education Innovation

Year

2016 HFD. Clinical Perspectives.

Teaches Clinical Implications in HF&D to 1st Year medical Students, SKMC at TJU designated as "Clinical Perspective, in recognition of my expertise in Clinical Anatomy.

2016/17 HF&D Curriculum

Report of Regional. National and International Invited Teaching and Presentations

Regional

1.2014. "Dysphasia Lusoria and other Variants of the Vertebral Artery: Clinical Implications," American Association of Clinical Anatomists (AACA), Salt Lake City, UT.

2. 2018. A Possible Association Between The Brachioradial Artery and Branching Variation in the Axillary Artery. American Association of Clinical Anatomist.. George Washington University , Wahington

National

1.2016, Pictorial Essay on 6 Variants of the Radial Artery that May Increase Procedural Elongation and Failure in Cardiac Catheterization," American Association of Clinical Anatomists (AACA), Oakland CA.

International

1.2015, "Pictorial Essay on 5 Variants of the Vertebral Artery and Clinical Implications" British Association of Clinical Anatomy (BACA), London, England.

2.2018 .Aberrant RSA **(2018)** Morphology and Clinical Implications British Association of Clinical Anatomy (BACA). Cambridge University, England June 26th-June 28th, 2018.

3.2019.Anatomic Supra-aortic Vascular Variants and Their Pathophysiology In Stroke Causation. A Pictorial Essay." International Conference on Neurology, Neurosurgery and Stroke (Amsterdam . The Netherlands. (June 10-11, 2019)

Report of Educational Services to the Community

Year(s)	Audience/Location	Educational Services/Contribution
2014-Present	Diversity Group Thomas Jefferson University	Regular attendance at meetings participation and contributions to discussions
2013-Present	Thomas Jefferson University	Writing educational references/ and letters of recommendations at students' requests
2013	Anatomy Laboratory	Participates with other faculty members in the development of free educational demonstration of anatomical structures to several public groups including numerous high school students (Friends Select) other health professional groups including but not limited nurse anesthetist ultrasound, neuroimaging and Sonography technicians
2016- 06/2022	Thomas Jefferson University	Faculty Advisor, Dance Group

Report of Scholarship

Manuscripts Published (Peer Reviewed)

1. C.L. Mills, **O. Ariyo**, K., M. Yamada, J. W. Lash , and Ruth Bellairs. (1990). Evidence for the involvement of Receptors for Fibronectin in the Promotion of Chick Tail Segmentation. Anat Embryol 182(5):425-434
2. **Ariyo O (2015)** . A Segmental Hypoplastic Anterior Tibial Artery Coexisting with an Hypertrophied Perforating Fibular Artery. A Case Report and Clinical implications. Int. J. Morphol., 33(1): 19-23.
- 3 **Ariyo O (2015)** Coupled Multiple Musculo-neurovascular Variations in Same Upper Limb. A Case Report and Clinical ssnificances. Int. J Morphol. 33(4):1406-1410.
- 4.**Ariyo O**, Fenderson, B. (2016). A Variant of the Classical Superficial Brachioulnoradial Artery. Morphology and Clinical Significances. Journal Surgical and Radiologic Anatomy38 (6) DOI 10.1007/s00276-015-1605-6
5. **Ariyo O**, Shea JR. (2016). Bilateral Bifid Median Nerve. High Origin of Its Palmar Cutaneous Branch, Bifid Median Nerve in Association with Accessory Forearm Muscles and their clinical implications. Int. J. Morphol., 34(3): 997-1001.
6. **Ariyo O**, Shea JR (2018). The Medial Brachial and Antebrachial Cutaneous Nerves of Posterior Cord Origin and Their Clinical Implications Journal of Anatomy and Physiological Studies April 2018
- 7 **Ariyo O**, (2018.) A High Origin Subscapular Trunk and its Clinical Implications Anatomy & Physiology May 2018
8. **Ariyo O**, Shea JR.(2018) Ulnar-Median Nerve Transposition: Embryology and Clinical Implications. Anat Physiol Vol. 8(6):311
9. **Ariyo O**. (2018). Raymond Shea Tortuosity in a Bilateral Brachioradial Artery of Dissimilar Arterial Origins and Clinical Implications Anatomy and Physiological Studies J Anat Physiol Volume 1(1):
10. **Ariyo, O**. (2019). A rare origin of the right vertebral artery and its clinical implications in a proximal occlusion to proximal origin to the brachiocephalic trunk. Ann Cardiovasc Thorac Surg. 2019 Volume 2 Issue 1
- 11 **Ariyo O. (2019)**A bifurcated axillary artery in its 2nd part and clinical implications Olutayo Ariyo International Journal of AnatOMIC Variants
- **12. Ariyo O (2019)**Bilateral Co-Existence of Le Minor Type 3 Variant With A 4-Root Median Nerve and Clinical Implications. JRSR- 15406/2019
International Journal of Recent Scientific Reseach

****13. Ariyo O (2019)** An Uncommon Arterial Trunk: Superficial Brachioradiomedian Artery and Its Clinical Significance

SCIREA Journal of Clinical Medicine.

14.

***14 Ariyo O. (2019),** A Rare Arterial Trunk : The Brachioradiomedian Artery and Its Clinical Implications.

15, Ariyo O. 2020 A Rare Origin of the Dorsal Scapular Artery and Its Clinical Implications Olutayo A Journal of American Surgical Case Report. (AJSCR-2020-1-106

Received: 15 January, 2020

Accepted: 27 January, 2020

16.Ariyo O. An Absent Subscapular Artery Co-Existing with Multiple Variants of the Brachial Plexus and Clinical Implications. Cell and Developmental Biology.**2020.** ISSN-2168-9296

17. Ariyo O (2021) A Rare Formation of Lateral Cutaneous Nerve of the Forearm and its Clinical Significance in Anesthesiology Journal of Clinical Anesthesia and Pain Medicine

Received December 03, 2020; Accepted January 03, 2021; Published January 19, 2021

18 Ariyo O . 2021. Left Vertebral Artery with Proximal Stenosis and Clinical Implications. Journal of Cardiology and Cardiovascular Interventions. Open Access

19. Ariyo O. 2021 Left Vertebral Artery with a Proximal Stenotic Origin and Clinical Implications Journal of Clinical Cardiology and Cardiovascular Interventions December 10, 2020; Accepted: February 08, 2021; Published: February 16, 2021

20. Ariyo.O (2021) Multiple Morphological Radial Artery Variants with Odds of Increased Procedural Complications in Percutaneous Coronary Procedure and Clinical Implications. Interventional Cardiology Journal 2021 : ISSN 2471-8157

Medical Education Abstracts

1. **Ariyo O** and Shea JR (2013) Axillary Artery Bifurcation. Accepted and published by European Association of Clinical Anatomy (EACA) Lisbon, Portugal.

2. **Ariyo O** and Shea JR (2013) Ulnar-Median Nerve Transposition. Accepted and published by European Association of Clinical Anatomy (EACA), Lisbon, Portugal.
3. **Ariyo O** (2014) Bilateral but Dissimilar Brachioradial Artery. Morphology and Clinical Implications. Accepted and published by British Association of Clinical Anatomy.
- 4 **Ariyo O** (2015). Aberrant Right Subclavian Artery Arising distal to Left Subclavian Artery and Its Clinical Implications. American Association of Clinical Anatomy. Salt-Lake City, Utah, Regional conference.
5. **Ariyo O.** (2015) Pictorial Essay on Variant Origins of the Vertebral Artery- Accepted for Oral presentation at the 2015 Winter Meeting of the British Association of Clinical Anatomy (BACA) London.
6. **Ariyo O.** (2015). Lusoria Dysphagia and Kommerrel Syndrome Accepted for poster presentation at the 2015 Winter Meeting of the British Association of Clinical Anatomy (BACA) London.
7. **Ariyo. O.** (2016) Anatomic Radial Artery Variants with Possible Increased Procedural Complications as Access Vessel In Cardiac Catheterization: A Pictorial Essay. Oral/Platform presentation, American Association of Clinical Anatomists (AACA), Oakland California USA.
- 8 **Ariyo O** (2016) .External and Internal Carotid Arteries transposition and its Clinical Significance. British Association for Clinical Anatomists. Brighton, England.
9. **Ariyo O.** (2016) Two rare origins of the vertebral arteries and their pathophysiological presentations relative to Subclavian Steal Syndrome. British Association of Clinical Anatomists/ Anatomical Society Brighton England.
10. **Ariyo O.** (2016). Bilateral Carotid Arteries Transposition Co-existing with a Medially placed Right Right Vagus Nerve. A Discussion of their Clinical Implications. Australia and New-Zealand Association of Clinical Anatomists(ANZACA). (2016)
11. **Ariyo O.** (2016) . Two rare aberrant origins of the vertebral artery and their clinical implications. ANZACA Australia and New-Zealand Association of Clinical Anatomists (ANZACA). (2016)
12. **Ariyo O.** (2017). The Subclavian Steal Syndrome (SSS) and Its stimulation in 4 Variants Of the Vertebral Artery. British Association of Clinical Anatomy (BACA). Burton-Upon Trent, U.K. Dec. 14th 2017.
13. 3 Aberrant RSA (2018) Morphology and Clinical Implications British Association of Clinical Anatomy (BACA). Cambridge University, June 26th-June 28th, 2018.
- 14.**Ariyo O.** 2018. A Possible Association Between the Brachioradial Artery and Branching Variation in the Axillary Artery. American Association of Clinical Anatomist. George Washington University, Washington DC

15. Ariyo O (2019)“ Anatomic Supra-aortic Vascular Variants and Their Pathophysiology In Stroke Causation. A Pictorial Essay.” International Conference on Neurology, Neurosurgery and Stroke (Amsterdam (June 10-11, 2019

17 Ariyo O.2020 Arterial Variants of the Popliteal Artery and Clinical Implications. . National Meeting, American Association of Clinical Anatomy. Weill Cornell Medicine
June 15 - 19, 2020
New York, NY

EEOC Number:530-2023-04067

From

Olutayo Ariyo MBBS., MBA
tmajor33@hotmail.com

TO

EEOC

801 Market Street

Philadelphia. PA 19107

OLUTAYO ARIYO MBBS., MBA VERSUS THOMAS JEFFERSON UNIVERSITY (TJU)
PHILADELPHIA PA.19107

- PROMISES NOT KEPT, TRUST BETRAYED, RACIALLY SLURRED,
- DISCRIMINATORY HIRING AND PAY LEVELS,
- PROMOTIONS INTENTIONALLY SCUTTLED AND DELAYED,
- TIMELINES LOST FROM DELAYED PROMOTIONS WEAPONIZED IN DENYING ME WELL EARNED AND DESERVED PROMOTIONS DESPITE MEETING OR SURPASSING REQUIRED MINIMUM.

OPENING STATEMENT.

I am requesting THOMAS JEFFERSON UNIVERSITY (TJU) to keep any tainted Associate Professor that has to be “CONTINGENT ON YOUR EXECUTION OF A GENERAL RELEASE OF CLAIMS AGAINST JEFFERSON AND ITS EMPLOYEES)

Rather, I am imploring TJU to refrain from any attempt at disrespecting, demeaning denigrating, casting aspersion at labelling me an “ineffective teacher which I find so offensive, denigrating, insulting and highly disrespectful.

2.Any attempts at using discretionary parameters to deny me a deserved and well-earned FULL Professor will be fully addressed and let the FACTS and not INUENDOS be the Judge”

3.It is preserving MY HONOR instead of signing off my rights to earning a tainted Promotion

TJU should live up and pay me the hundreds of thousands in outstanding salary and benefits over the years (>\$500000) from mis-designating me a RESEARCH ASSOCIATE while performing the duties of a faculty, educationally and financially exploiting me

That is highly unacceptable for Senior Colleagues in Authority Positions on behalf of the University to scuttle and intentionally delay my Promotions through submission of a prejudicial and misleading Students evaluations, delaying my promotion from an Instructor to CLINICAL ASSISTANT PROFESSOR by 4 years, a **timeline equals to the Time in Rank between Assistant and Associate Professor**

Mis- designating as a RESEARCH ASSOCIATE A for 8 years and inappropriately delaying my promotion for 4 years constituted 12 years out of 17 years MY ACADEMIC CAREER were BATTERED, and a double jeopardy when these years were weaponized as “NO ENOUGH TIME IN RANK) to earn deserved Higher Ranks and attending financial rewards.

I an HUMANN.

AMedical Doctor- choice of great financial rewards from CLINICAL PRACTICE

MBA-Declined 6 figure jobs offered

Loved Teaching with great Passions.

THE SHABBY TREATMENT, THE DISRESPECT, THE HORRORS OF A HOSTILE ENVIRONMENT resulted in reporting 3 colleagues- (Prof.Schmidt, Dr.Spudich, Dr.Zhang to the University for GROSS UNPROFESSIONALISM.

NEVER KNEW ACADEMIA CAN BE THIS NIGHTMARISH

SO PAINFFULLY REGRETABLE. Indeed, a Case of INHUMANITY OF MAN TO MAN BY SOME.

12 wasted years of my academic TIMELINE is inexcusable as a result of unwanted punitive collateral damages that denies me deserved earlier promotions and accrued adequate financial benefits from DELAYED/DENIED deserved higher academic ranks; and a case of a DOUBLE JEOPARDY when inadequate time in Rank was weaponized in denying me deserved promotions, despite having met or surpassing specified requirements for those positions

In the US, MD, DO and PH. D seeking a career in

Anatomy are hired entry level as an Assistant Professor

Below are guidelines and requirements for Promotion at TJU.

TIMELINE FOR FACULTY POSITION /PROMOTION AT TJU

RANK.	TIME IN RANK.	PEER REVIEWED
PUBLICATIONS		
• INSTRUCTOR TO – ASSISTANT PROF.	** 1 year	NIL ***
• ASSISTANT TO ASSOCIATE.PROF.	4.	10
• ASSOCIATE TO FULL PROFESSOR.	5	20

MY TIMELINEAT TJU

Mis-designated RESEARCH ASSOCIATE A	8.	1
2005 -2013		
INSTUCTOR TO CLINICAL ASSISTANT PROFESSOR	** 5	9.**
2013-2018		
Clinical ASSISTANT- PROF.	4	20.
2018-2022		

- Normally even in 2005, I was more than qualified for an ASSISTANT PROFESSOR as this Rank requires NO PUBLICATION***
- It took me **5 YEARS (2013- 2018) from the INSTRUCTOR to the Clinical ASSISTANT Professor , which normally requires **1 year
- **NO Publication** required from and Instructor to the ASSISTANT PROFESSOR
- It took me 9** **PUBLICATIONS** from the Instructor to Clinical Assistant Professor rank

SO,

BY 2018 when I finally became A Clinical ASSISTANT Professor I was ONE Publication away meeting the required 10 for the ASSOCIATE PROFESSOR RANK

Excerpt from my CV

8. Ariyo O, Shea JR.(2018) Ulnar-Median Nerve Transposition: Embryology and Clinical Implications. Anat Physiol Vol. 8(6):311

9. Ariyo O. (2018). Raymond Shea Tortuosity in a Bilateral Brachioradial Artery of Dissimilar Arterial Origins and Clinical Implications Anatomy and Physiological Studies J Anat Physiol Volume 1(1):

10. Ariyo, O. (2019). A rare origin of the right vertebral artery and its clinical implications in a proximal occlusion to proximal origin to the brachiocephalic trunk. Ann Cardiovasc Thorac Surg. 2019 Volume 2 Issue 1

I earned my10 Peer Reviewed Publications in JAN 2019. I WAS QUALIFIED THEN TO ASK FOR A PROMOTION TO THE ASSOCIATE PROFESSOR. BUT I WAITED UNTIL 2020 task for SUCH Promotiom I ONLY NEEDED 10 PUBLICATIONS.

IN 2020 ,Ihave earned 16 PEER REVIEWED PUBLICATIONS

15, Ariyo O. 2020 A Rare Origin of the Dorsal Scapular Artery and Its Clinical Implications Olutayo A

Journal of American Surgical Case Report. (AJSCR-2020-1-106

Received: 15 January, 2020

Accepted: 27 January, 2020

16.Ariyo O. An Absent Subscapular Artery Co-Existing with Multiple Variants of the Brachial Plexus and Clinical Implications. Cell and Developmental Biology.2020. ISSN-2168-9296

17. Ariyo O (2021) A Rare Formation of Lateral Cutaneous Nerve of the Forearm and its Clinical Significance in Anesthesiology Journal of Clinical Anesthesia and Pain Medicine Received December 03, 2020; Accepted January 03, 2021; Published January 19, 2021

YR 2020.

Requested for a PROMOTION TO ASSOCIATE PROFESSOR.

THIS WAS DENIED

REASONS ADDUCED BY TJU represented by VICE CHAIRMAN Prof. MENKO during my YR2020/21 FACULTY PERFORMANCE REVIEW.

CITED REASONS FOR THE DENIAL.

YR2019/2020 EVALUATIONS : 3 STUDENTS Comments DEEMED NEGATIVE

1. A female Student claimed Dr. Ariyo his rolled eyes after she gave a wrong answer to question asked.

-Will not dignify such. Out of character. My daughter, An Intern Pediatrician, IVY LEAGUE trained can attest to respect I accord ALL Students.

ii)a Group dissecting the upper limb, claimed I asked a Lower limb question

- **What if I did ? When does it become the norm students ,dictating e questions to be asked them by their Professors ?..**

iii) Another female student complained why I brought up a discussion on the relationship between ACROSOMAL REACTION AND POLYSPERMY

A valid and valuable Clinical vignette.,

With due respect, there is always this CONFLICT, Non-Clinical Superiors in judgement over those of us who are CLINICIANS.

6/21/2022

ZOOM MEETING OF 6/21/2022.

TRYING GETTING JUSTICE BEFORE MY RETIREMENT ON 6/30/22.

My first communication on this was dated back as far 12/21 which was climaxed with the Zoom Meeting with the Vice Provost on 6/21/2022.

I have had 20 Peer Reviewed Publications minimum required for the RANK of a FULL PROFESSOR as supported by my Excerpts from my CV below.

EXCERPTS

16.Ariyo O. An Absent Subscapular Artery Co-Existing with Multiple Variants of the Brachial Plexus and Clinical Implications. Cell and Developmental Biology.**2020.** ISSN-2168-9296

17. Ariyo O (2021) A Rare Formation of Lateral Cutaneous Nerve of the Forearm and its Clinical Significance in Anesthesiology Journal of Clinical Anesthesia and Pain Medicine Received December 03, 2020; Accepted January 03, 2021; Published January 19, 2021

18 Ariyo O . 2021. Left Vertebral Artery with Proximal Stenosis and Clinical Implications. Journal of Cardiology and Cardiovascular Interventions. Open Access

19. Ariyo O. 2021 Left Vertebral Artery with a Proximal Stenotic Origin and Clinical Implications Journal of Clinical Cardiology and Cardiovascular Interventions

December 10, 2020; Accepted: February 08, 2021; Published: February 16, 2021

20. Ariyo.O (3021) Multiple Morphological Radial Artery Variants with Odds of Increased Procedural Complications in Percutaneous Coronary Procedure and Clinical Implications. Interventional Cardiology Journal 2021 : ISSN 2471-81

6/21/2022.

With 20 peer reviewed Publications
ZOOM Meeting had with the Vice-Provost Professor Novielle
Request to be promoted to the FULL Professor- DENIED

,
Promotion to the Associate Professor Rank offered and accepted.

6/27/2022

I respectfully requested a promotion to the Associate Professor level be “backdated as at when due and any accrued financial compensation paid .

6/30 /2022

In an E-mail received on 6/30/2022

TJU's Response to my requests I would categorize as

- Unkind
- Insensitive,
- Highly disrespectful
- Offensive
- Bellitling
- Attempt to humiliate
- Casting ASPERSION ON MY ACADEMIC ACCOMPLISHMENTS
- TJU trying to play a PONTIOUS PILATE
- TJU Eating her Cake and Wanting it Back

hauling everything in the kitchen sink at my collective career

Discretionary allegations hauled to malign my brilliant career were totally FLAWED AND FALSE

Discretionary Requirements weaponized include,

- Time in Rank.
- Impact
- Attendances at Scientific Meetings were recent.
- External Services/Faculty Committee Membership
- Concerns over teaching effectiveness

REBUTTALS.

AS TO INVITATIONS TO SCIENTIFIC MEETINGS DEEMED RECENT.

My Invitations.

- 2013. EACA), Lisbon, Portugal.
- 2015. AACA Salt-Lake City, Utah, Regional conference. .
- 2015. BACA) Plymouth England
- 2016. AACA), Oakland California USA.
- 2016 AACA Brighton, England.
- 2016. ANZACA). (2016)
- 2017 BACA). Burton-Upon Trent, U.K.
- 2018 (BACA). Cambridge University, June 26th-June 28th, 2018.
- 2018 AACA George Washington University, Washington DC
- 2019 International Conference on Neurology, Neurosurgery and Stroke (Amsterdam)
- 2020 AACA National Meeting, American Association of Clinical Anatomy.
Weill Cornell Medicine
- 2021- AACA National MEETING

HOW CAN ABOVE BE ADJUGED RECENT/.

There at TJU is a colleague Dr. Guiyang Zhang MD., Ph.D , hired after me with little or no experience it teaching Anatomy promoted an ASSOCIATE PROFESSOR on or about 2018/19, with ALL HER INVITATIONS LIMITED TO JUST ONE SCIENTIFIC ANATOMY ASSOCIATION, -THE AMERICAN ASSOCIATION OF CLINICAL ANATOMISTS (AAA)

CONSTRASTED AGAINST DR.ZHANGS SCIENTIFIC MEETINGS, WHERE AND WHEN

Abstracts & Presentations

- Zhang,G. **Gaining Course.** American Association of Anatomists, Experimental Biology, San Diego, April 2-6, 2016.
- Zhang, G. AOA Research Symposium, Thomas Jefferson University, 2018
- Zhang, G. **in.** Sigma Xi Student Research Day, Thomas Jefferson University, April 10, 2018
- Zhang, G., Fenderson, B.A., Zuo, X. **Self-Directed Learning Modules Enhance** American Association of Anatomists, Experimental Biology, San Diego, CA, April 21-24, 2018
- Rana T, Laoteppitaks, C, Zhang, G, Troutman, G, Chandra S. **An Investigation** American Association of Anatomy, Experimental Biology, 2020.
- Tomatsu, S and Zhang, G. American Association of Anatomy, Experimental Biology (Virtual), April 27-30, 2021
- Zhang, G and Tomatsu, S. American Association of Anatomy, Experimental Biology (Virtual), April 27-30, 2021

2. TALK OF IMPACT

DR. ARIYO'S FEATURED PEER-REVIEWED PUBLICATIONS

REPORT OF MY SCHOLARSHIP.

Manuscripts Published (Peer Reviewed)

1. C.L. Mills, **O. Ariyo**, K., M. Yamada, J. W. Lash , and Ruth Bellairs. (1990). Evidence for the involvement of Receptors for Fibronectin in the Promotion of Chick Tail Segmentation. Anat Embryol 182(5):425-434

2. **Ariyo O (2015)** . A Segmental Hypoplastic Anterior Tibial Artery Coexisting with an Hypertrophied Perforating Fibular Artery. A Case Report and Clinical implications. Int. J. Morphol., 33(1): 19-23.

3 **Ariyo O (2015)** Coupled Multiple Musculo-neurovascular Variations in Same Upper Limb. A Case Report and Clinical sSgnificances. Int. J Morphol. 33(4):1406-1410.

4.**Ariyo O**, Fenderson, B. (2016). A Variant of the Classical Superficial Brachioulnoradial Artery. Morphology and Clinical Significances. Journal Surgical and Radiologic Anatomy38 (6) DOI 10.1007/s00276-015-1605-6

5. **Ariyo O**, Shea JR. (2016). Bilateral Bifid Median Nerve. High Origin of Its Palmar Cutaneous Branch, Bifid Median Nerve in Association with Accessory Forearm Muscles and their clinical implications. Int. J. Morphol., 34(3): 997-1001.

6. **Ariyo O**, Shea JR (2018). The Medial Brachial and Antebrachial Cutaneous Nerves of Posterior Cord Origin and Their Clinical Implications Journal of Anatomy and Physiological Studies April 2018

7 **Ariyo O**, (2018.) A High Origin Subscapular Trunk and its Clinical Implications Anatomy & Physiology May 2018

8. **Ariyo O**, Shea JR.(2018) Ulnar-Median Nerve Transposition: Embryology and Clinical Implications. Anat Physiol Vol. 8(6):311

9. **Ariyo O**. (2018). Raymond Shea Tortuosity in a Bilateral Brachioradial Artery of Dissimilar Arterial Origins and Clinical Implications Anatomy and Physiological Studies J Anat Physiol Volume 1(1):

10. **Ariyo, O**. (2019). A rare origin of the right vertebral artery and its clinical implications in a proximal occlusion to proximal origin to the brachiocephalic trunk. Ann Cardiovasc Thorac Surg. 2019 Volume 2 Issue 1

11 **Ariyo O**. (2019)A bifurcated axillary artery in its 2nd part and clinical implications Olutayo Ariyo International Journal of AnatOMIC Variants

****12. Ariyo O (2019) Bilateral Co-Existence of Le Minor Type 3 Variant With A 4-Root Median Nerve and Clinical Implications. JRSR- 15406/2019**

International Journal of Recent Scientific Reseach

****13. Ariyo O (2019)** An Uncommon Arterial Trunk: Superficial Brachioradiomedian Artery and Its Clinical Significance
SCIREA Journal of Clinical Medicine.
14.

***14 Ariyo O. (2019)**, A Rare Arterial Trunk : The Brachioradiomedian Artery and Its Clinical Implications.

15, Ariyo O. 2020 A Rare Origin of the Dorsal Scapular Artery and Its Clinical Implications
Olutayo A
Journal of American Surgical Case Report. (AJSCR-2020-1-106
Received: 15 January, 2020
Accepted: 27 January, 2020

16.Ariyo O. An Absent Subscapular Artery Co-Existing with Multiple Variants of the Brachial Plexus and Clinical Implications. *Cell and Developmental Biology*.**2020**. ISSN-2168-9296

17. Ariyo O (2021) A Rare Formation of Lateral Cutaneous Nerve of the Forearm and its Clinical Significance in Anesthesiology *Journal of Clinical Anesthesia and Pain Medicine*
Received December 03, 2020; Accepted January 03, 2021; Published January 19, 2021

18 Ariyo O . 2021. Left Vertebral Artery with Proximal Stenosis and Clinical Implications.
Journal of Cardiology and Cardiovascular Interventions. Open Access

19. Ariyo O. 2021 Left Vertebral Artery with a Proximal Stenotic Origin and Clinical Implications *Journal of Clinical Cardiology and Cardiovascular Interventions*
December 10, 2020; Accepted: February 08, 2021; Published: February 16, 2021

20. Ariyo.O (3021) Multiple Morphological Radial Artery Variants with Odds of Increased Procedural Complications in Percutaneous Coronary Procedure and Clinical Implications.
Interventional Cardiology Journal 2021 : ISSN 2471-8157

IN CONTRAST.

DR.ZHANG'S FEATURED PEER-REVIEWED PUBLICATIONS
Lippincotts Illustrated Q&A Review of Histology

•

- Medical School Anatomy and Pathology Workshops for High School Students Enhance Learning and Provide Inspiration for Careers in Medicine. *Academic Pathology*, 2016, 3:1
- Equivalence of students' scores on timed and untimed anatomy practical examinations. *Anatomical Sciences Education*, 2013, 6:281
- A horseshoe kidney with a unique constellation of renal vasculature-a case report. *Int J Anat Var*, 2019, 12:2
- Bilateral accessory flexor muscle of the forearm giving rise to a variant head of the first lumbrical. *International Journal of Anatomical Variations*, 2015, 8: 4

Dr.ZHANG is a year away from being a FULL Professor

CONCERNS OVER MY TEACHING EFFECTIVENESS

A BRIEF BACKGROUND TO MY HIRING AT TJU.

- Falsehood and lies can easily be CONCOCTED, and can be made VIRAL for some HIDDEN, AGENDA.
- No one enjoyed this more than Prof.Schmidt, who in 2005 promised to hire me at the ASSISTANT Professor Level, and trusting him to his words which turned to a SUICIDAL PILL , offered me a Temporary Staus as a RESEARCH ASSOCIATEA while waiting he sent my CV and my Publications for FORMAL Credentialling by TJUProf.Schmidt then was Head of Anatomy Division and Vice Chairman Pathology, Anatomy and CELL Biology.
- By 2005, I had worked closely with Prof.Schmidt teaching ANATOMY at the dissecting Rooms where 95% of Anatomy is taught and Learnt.
- My competency was never in doubt in those 10 yearsishould be able to TRUST Prof.Schmidt to his words.Well Prof.Scmidt had a hidden Agenda.
- 1.GIVE A PROMISE OFFER A TEMPORARY POSITION AT THE RESEARCH ASSOCIATE POSITION, TELL DR.ARIYO TO ACCEPTING THIS
- THEN ABANDONED HIM AT THE LEVEL OF RESEARCH ASSOCIATE AT FINANCIAL COMPENSATION OF \$40000/YR BASE SALARY
- SADDLE DR .ARIYO WITH THE FULL RESPONSIBILITIES OF A FULL FACULTY
- ABANDON DR.ARIYO S A RESEARCH ASSOCIATE A POSITION
- THEN, then for the next 8 Years aACADEMICALLY AND FINANCIALLY EXPLOITED,

Generally in the US, MD, DO and PH. D seeking a career in Anatomy are hired entry level as an Assistant Professor (Exhibits culled)

- An ASSISTANT PROFESSOR SALARY AT TJU HOVERS AROU\$90000/YR BASE SALARY, A DIFFERENTIAL OF \$50000/YR , IN 8 YEARS AMOUNTED TO \$400000 (Four hundred Thousand dollars)
- \$10000 IN BENEFITS FROM TJU 403b CONTRIBUTIONS TO FACULY RETIREMENT AMOUNTING TO \$80/000 (Eighty Thousand dollars)
- SALARY AND BENEFITS DENIED AMOUNTED TO \$480,000)(Forty hundred and eighty thousand dollars

- ABOVE MAY BE SOMETHING PROF. SCHMIDT did NOT WANT KNOWN HENCE THE FALSEHOOD OF MY TEACHING INEFFECTIVENESS AND AN ATTEMPT IN YR-2011 DISMISSED (EXHIBIT)

DEBUNKING TEACHING INEFFECTIVENESS.

At this point , time to let TJU know of my TEACHING ACCOMPLISHMENTS BEFORE ARRIVING AT TJU.

AS a Medical Trainee Fellow, at the US oldest Medical School, prestigious University of Pennsylvania (UPENN)P

rof.John Weisel, the then Director of ANATOMY Program “I know Tayo. He was a good Instructor” “Tayo knows his ANATOMY”as communicated with TJU 2012

(Exhibit xxxx)

Excerpts from a letter from the then Chairman Anatomy on me.

(Exhibit. Xxxx)

On a Scale of 1-4- A student Evaluation – 4(Exhibit xxx)

At TJU,

Assigned to teach the first 2 Lectures in Anatomy (Back Anatomy and Spinal Cord) to incoming 1st Medical Students 2023-209 until when replaced by Prof .Schmidt . SON to a TRUSTEE had lamented “Prof.Schmidt, despite the high tuition we paid towards our Medical Education why is our 2 Lectures in the Medical School given by A B LACKMAN “This was how I got REPLACED, not REMOVED

With so much overwhelming Evaluation on students Evaluations acknowledging Dr. Ariyo as best teaching us CLINICAL ANATOMY

- A special `1hr Review of CLINICAL ANATOMY was set up by the DIVISION, penultimate week before any Major Exams at FOEDERER HALL between 5-6 PM.(CLASS OF 2020

Directed and solely supervised the 2 MOST ADVANCED COUSES IN ANATOMY at TJU.-

- ANAT.404. A much sought after ELECTIVE COURSE for 4th Year Medical Students. Surgical Anatomy to RESIDENTS IN ENT, Maxillo-facial, Dermatology and OTOLANYGOLOGY (2012-2022).

•

Thanks tAND A HUGE SALUTE TO A MAN OF HONOR-Prof. PEIPER.

A man of his words-

- HONORABLE
- His style of Administration, replicates what are needed, required of a HIGH PERFORMING ORGARNISATION

- Environmentally friendly working and scholarly rewarding
- FAIRNESS
- OPENESS
- EMPOWERED OTHERS
- ASSOCIATION OF JUNIOR FACULTY ACKNOWLEDGED-FREQUENT MEETINGS
- Encourages Members to share EXPERIENCES.
- SCHOLARSHIP VERY WELL SUPPORTED, BY THIS ADMINISTRATION MORALLY, FINANCIALLY,
- LOCAL, NATIONAL INTERNATIONAL INVITATIONS -WELL SUPPORTED, BY THIS ADMINISTRATION , MORALLY, FINANCIALLYNO EXCEPTIONS
- EMPOWERED OTHERS- Well, good for Organizational growth ---- Unfortunately - others may use this empowerment conferred on them as POWER ABUSE- that may have robed on his Administration negatively

THE MOSES SENT MY WAY,BUT THE POND WAS ALREADY OVERPOPULATED WITH TOO MANY REVENGING SHARKS AND SOME DEMANDING THEIR POUND OF FLESH---- BUT OVERALL

HE DID HIS BEST.

IN SUMMARY.

We ALL pass through this life once.Lives ruined may be irrevocably damaged, and no financial compensation can obliterate the anguished and collateral damages .

TO TJU, I can itemize close to or more than \$500000 DENIED from.

- **MISDESIGNATION**
- **DELAYED PROMOTIONS**
- **DENIED PROMOTIONS**

FAIRNESS IS FAIRNESS. ON IMPACT: AACA INVIVITATION RECEIVED IN 2020

On behalf of the Association we are contacting you **to ask for your assistance with what we believe is one of the most important elements in organizing the scientific sessions for the 2020 AACA Annual Meeting in New York, reviewing abstracts** I cannot be more PROUD of this RECOGNITION so HONORED and even in 2021, another INVITATION by AACA another Invitation to serve a JUDGE in deciding the Award winning BEST STUDENT's PLATFORM

AT THE HEIGHT OF COVID. With FACE TO FACE GOT REPLACED BY VISUAL TEACHING Olutayo Ariyo MBBS., MBA, with Recent BILATERAL KNEE SURGEGERY , at age 69 PUT his life on the line CHAMPIONED HYBRID TEACHING, going to the DISSECTING ROOM TO DO DISSECTION BY SELF

STUDENTS CAME IN IN SMALL GROPUS, WELL PPE GOWNED, MAINTAINED SAVE DISTANCES and was taught Anatomy the BEST WAY to learn this.

MY PASSION

I HAD CHOICES FOR BETTER FINANCIAL REWARDS

-More financially rewarding CLINICAL PRACTICE

DECLINED SEVERAL OFFERS OF SIX FIGURES EARNING AFTER MY MBA DIPLOMA.

My foray into Academics especially ,

TO DO WHAT ANATOMISTS DO.

Anatomy is what Anatomists do.

I, Olutayo Ariyo, MBBS., MBA pray that a right to sue letter be issued to enable me pursue my right to redress for the racial , hiring and pay discriminations, the inappropriately and intentionally delayed Promotion from the Instructor to Clinical Assistant Professor, the MISDESIGNATION as a RESEARCH ASSOCIATE A as an OFFICER OF TJU, a VICE CHAIRMAN, would not honor pledge made, and as such everything about my employment were subjected to multiple Bandwagon effects and untold COLLATERAL DAMAGES, Huge financial loss and Jefferson descending to denigrate my accomplishments including having doubts over my Teaching effectiveness, the Director who solely supervised the most advanced ANATOMY COURSE TO SURGICAL RESIDENTS with perfect Scores on their Evaluation sheets? .TJU may chose to not rewarding and giving me the FULL PROFESSOR I BELIEVE I HAVE EARNED. AND MERITORIOUSLY TOO.

How about having 2 EMERITUS Professors agreeing to write a Recommendations when seeking a promotion to the CLINICAL ASSISTANT PROFESSOR?.

Let the world ask them what they saw in my scholarship and not a denial of a Promotion because a Student alleged I rolled my eyes at her for giving a wrong answer to a question she has asked- NOT DR.ARIYO, that compassionate "SOLID, HIGHLY INTELLIGENT, VERY FRIENDLLY tEACHER, Most reputed EVENING VISITS TO ASSIST STUDENTS IN THE LAB, and a proud to an AN IVY LEAGUE SCHOLAR TODAY

an Attending Pediatrician, who I can prodly say was voted Best RESIDENTS at Graduating? She kows too well the compassion I have for Students generally when TJU Students run int her and ask "Is Dr.Ariyo your DAD?.

When I NORMALLY TRIAGE STUDENTS AFTER their 1st Exams and I would normally step ed up to individually help in teaching ANATOMY, Of my MY TIME , in the evenings teaching structures, relationships. Glad to report on some of their comments on EVALUATION SHEETS

"DR.ARIYO, but were it not for you,,,,," Dr.Ariyo, wish I had met you earlier.....)

TITLE ALONE may not DEFINE ME IN ACADEMIA- but

- Those 19 PUBLICATIONS IN 6 YEARS (2015-20210 in a more friendly, working environment, provided under the Prof. PEIPER Administration
- ALL 19 PEER REVIEWED PUBLICATIONS, I was 1st AUTHOR.14 OF WHICH the FIRST AUTHOR .

Olutayo Ariyo MBBS., MBA

(610) 931 7383.

From
Olutayo Ariyo MBBS., MBA
tmajor33@hotmail.com

TO
EEOC
801 Market Street
Philadelphia. PA 19107

OLUTAYO ARIYO MBBS., MBA VERSUS THOMAS JEFFERSON UNIVERSITY (TJU)
PHILADELPHIA PA.19107

- PROMISES NOT KEPT, TRUST BETRAYED, RACIALLY SLURRED,
- DISCRIMINATORY HIRING AND PAY LEVELS,
- PROMOTIONS INTENTIONALLY SCUTTLED AND DELAYED,
- TIMELINES LOST FROM DELAYED PROMOTIONS WEAPONIZED IN DENYING ME WELL EARNED AND DESERVED PROMOTIONS DESPITE MEETING OR SURPASSING REQUIRED MINIMUM.

OPENING STATEMENT.

I am requesting THOMAS JEFFERSON UNIVERSITY (TJU) to keep any tainted Associate Professor that has to be “CONTINGENT ON YOUR EXECUTION OF A GENERAL RELEASE OF CLAIMS AGAINST JEFFERSON AND ITS EMPLOYEES)

Rather, I am imploring TJU to refrain from any attempt at disrespecting, demeaning denigrating, casting aspersion at labelling me an “ineffective teacher which I find so offensive, denigrating, insulting and highly disrespectful.

2.Any attempts at using discretionary parameters to deny me a deserved and well-earned FULL Professor will be fully addressed and let the FACTS and not INUENDOS be the Judge”

3.It is preserving MY HONOR instead of signing off my rights to earning a tainted Promotion

TJU should live up and pay me the hundreds of thousands in outstanding salary and benefits over the years (>\$500000) from mis-designating me a RESEARCH ASSOCIATE while performing the duties of a faculty, educationally and financially exploiting me

That is highly unacceptable for Senior Colleagues in Authority Positions on behalf of the University to scuttle and intentionally delay my Promotions through submission of a prejudicial and misleading Students evaluations, delaying my promotion from an Instructor to CLINICAL ASSISTANT PROFESSOR by 4 years, a timeline equals to the Time in Rank between Assistant and Associate Professor

Mis- designating as a RESEARCH ASSOCIATE A for 8 years and inappropriately delaying my promotion for 4 years constituted 12 years out of 17 years MY ACADEMIC CAREER were BATTERED, and a double jeopardy when these years were weaponized as “NO ENOUGH TIME IN RANK) to earn deserved Higher Ranks and attending financial rewards.

I an HUMANN.

AMedical Doctor- choice of great financial rewards from CLINICAL PRACTICE

MBA-Declined 6 figure jobs offered

Loved Teaching with great Passions.

THE SHABBY TREATMENT, THE DISRESPECT, THE HORRORS OF A HOSTILE ENVIRONMENT resulted in reporting 3 colleagues- (Prof.Schmidt, Dr.Spudich, Dr.Zhang to the University for GROSS UNPROFESSIONALISM.

NEVER KNEW ACADEMIA CAN BE THIS NIGHTMARISH

SO PAINFULLY REGRETABLE. **Indeed, a Case of INHUMANITY OF MAN TO MAN BY SOME.**

12 wasted years of my academic TIMELINE is inexcusable as a result of unwanted punitive collateral damages that denies me deserved earlier promotions and accrued adequate financial benefits from DELAYED/DENIED deserved higher academic ranks; and a case of a DOUBLE JEOPARDY when inadequate time in Rank was weaponized in denying me deserved promotions, despite having met or surpassing specified requirements for those positions

In the US, MD, DO and PH. D seeking a career in

Anatomy are hired entry level as an Assistant Professor

Below are guidelines and requirements for Promotion at TJU.

TIMELINE FOR FACULTY POSITION /PROMOTION AT TJU

RANK.	TIME IN RANK.	PEER REVIEWED
PUBLICATIONS		
• INSTRUCTOR TO – ASSISTANT PROF.	** 1 year	NIL ***
• ASSISTANT TO ASSOCIATE.PROF.	4.	10
• ASSOCIATE TO FULL PROFESSOR.	5	20

MY TIMELINE AT TJU

Mis-designated RESEARCH ASSOCIATE A	8.	1
2005 -2013		
INSTRUCTOR TO CLINICAL ASSISTANT PROFESSOR	** 5	9.**
2013-2018		
Clinical ASSISTANT- PROF.	4	20.
2018-2022		

- Normally even in 2005, I was more than qualified for an ASSISTANT PROFESSOR as this Rank requires NO PUBLICATION***
- It took me **5 YEARS (2013- 2018) from the INSTRUCTOR to the Clinical ASSISTANT Professor , which normally requires **1 year
- **NO Publication** required from and Instructor to the ASSISTANT PROFESSOR
- It took me 9** **PUBLICATIONS** from the Instructor to Clinical Assistant Professor rank

SO,

BY 2018 when I finally became A Clinical ASSISTANT Professor I was ONE Publication away meeting the required 10 for the ASSOCIATE PROFESSOR RANK

Excerpt from my CV

8. Ariyo O, Shea JR.(2018) Ulnar-Median Nerve Transposition: Embryology and Clinical Implications. Anat Physiol Vol. 8(6):311

9. Ariyo O. (2018). Raymond Shea Tortuosity in a Bilateral Brachioradial Artery of Dissimilar Arterial Origins and Clinical Implications Anatomy and Physiological Studies J Anat Physiol Volume 1(1):

10. Ariyo, O. (2019). A rare origin of the right vertebral artery and its clinical implications in a proximal occlusion to proximal origin to the brachiocephalic trunk. Ann Cardiovasc Thorac Surg. 2019 Volume 2 Issue 1

I earned my10 Peer Reviewed Publications in JAN 2019. I WAS QUALIFIED THEN TO ASK FOR A PROMOTION TO THE ASSOCIATE PROFESSOR.

**BUT I WAITED UNTIL 2020 task for SUCH Promotiom
I ONLY NEEDED 10 PUBLICATIONS.**

IN 2020 ,Ihave earned 16 PEER REVIEWED PUBLICATIONS

15, Ariyo O. 2020 A Rare Origin of the Dorsal Scapular Artery and Its Clinical Implications
Olutayo A

Journal of American Surgical Case Report. (AJSCR-2020-1-106

Received: 15 January, 2020

Accepted: 27 January, 2020

16.Ariyo O. An Absent Subscapular Artery Co-Existing with Multiple Variants of the Brachial Plexus and Clinical Implications. Cell and Developmental Biology.**2020**. ISSN-2168-9296

17. Ariyo O (2021) A Rare Formation of Lateral Cutaneous Nerve of the Forearm and its Clinical Significance in Anesthesiology Journal of Clinical Anesthesia and Pain Medicine
Received December 03, 2020; Accepted January 03, 2021; Published January 19, 2021

YR 2020.

Requested for a PROMOTION TO ASSOCIATE PROFESSOR.

THIS WAS DENIED

REASONS ADDUCED BY TJU represented by VICE CHAIRMAN Prof. MENKO during my
YR2020/21 FACULTY PERFORMANCE REVIEW.

CITED REASONS FOR THE DENIAL.

YR2019/2020 EVALUATIONS : 3 STUDENTS Comments DEEMED NEGATIVE

1. A female Student claimed Dr. Ariyo his rolled eyes after she gave a wrong answer to question asked.

-Will not dignify such. Out of character. My daughter, An Intern Pediatrician, IVY LEAGUE trained can attest to respect I accord ALL Students.

ii)a Group dissecting the upper limb, claimed I asked a Lower limb question

- What if I did ? When does it become the norm students ,dictating e questions to be asked them by their Professors ?..

iii) Another female student complained why I brought up a discussion on the relationship between ACROSOMAL REACTION AND POLYSPERMY

A valid and valuable Clinical vignette,.

With due respect, there is always this CONFLICT, Non-Clinical Superiors in judgement over those of us who are CLINICIANS.

6/21/2022

ZOOM MEETING OF 6/21/2022.

TRYING GETTING JUSTICE BEFORE MY RETIREMENT ON 6/30/22.

My first communication on this was dated back as far 12/21 which was climaxed with the Zoom Meeting with the Vice Provost on 6/21/2022.

I have had 20 Peer Reviewed Publications minimum required for the RANK of a FULL PROFESSOR as supported by my Excerpts from my CV below.

EXCERPTS

16.Ariyo O. An Absent Subscapular Artery Co-Existing with Multiple Variants of the Brachial Plexus and Clinical Implications. Cell and Developmental Biology.**2020.** ISSN-2168-9296

17. Ariyo O (2021) A Rare Formation of Lateral Cutaneous Nerve of the Forearm and its Clinical Significance in Anesthesiology Journal of Clinical Anesthesia and Pain Medicine Received December 03, 2020; Accepted January 03, 2021; Published January 19, 2021

18 Ariyo O . 2021. Left Vertebral Artery with Proximal Stenosis and Clinical Implications. Journal of Cardiology and Cardiovascular Interventions. Open Access

19. Ariyo O. 2021 Left Vertebral Artery with a Proximal Stenotic Origin and Clinical Implications Journal of Clinical Cardiology and Cardiovascular Interventions
December 10, 2020; Accepted: February 08, 2021; Published: February 16, 2021

20. Ariyo.O (3021) Multiple Morphological Radial Artery Variants with Odds of Increased Procedural Complications in Percutaneous Coronary Procedure and Clinical Implications. Interventional Cardiology Journal 2021 : ISSN 2471-81

6/21/2022.

With 20 peer reviewed Publications
ZOOM Meeting had with the Vice-Provost Professor Novielle
Request to be promoted to the FULL Professor- DENIED
,
Promotion to the Associate Professor Rank offered and accepted.

6/27/2022

I respectfully requested a promotion to the Associate Professor level be “backdated as at when due and any accrued financial compensation paid .

6/30 /2022

In an E-mail received on 6/30/2022
TJU’s Response to my requests I would categorize as

- Unkind
- Insensitive,
- Highly disrespectful
- Offensive
- Bellitling
- Attempt to humiliate
- Casting ASPERSION ON MY ACADEMIC ACCOMPLISHMENTS
- TJU trying to play a PONTIOUS PILATE
- TJU Eating her Cake and Wanting it Back

hauling everything in the kitchen sink at my collective career
Discretionary allegations hauled to malign my brilliant career were totally FLAWED AND FALSE

Discretionary Requirements weaponized include,

- Time in Rank.
- Impact
- Attendances at Scientific Meetings were recent.
- External Services/Faculty Committee Membership
- Concerns over teaching effectiveness

REBUTTALS.

AS TO INVITATIONS TO SCIENTIFIC MEETINGS DEEMED RECENT.

My Invitations.

- 2013. EACA), Lisbon, Portugal.
- 2015. AACA Salt-Lake City, Utah, Regional conference. .
- 2015. BACA) Plymouth England
- 2016. AACA), Oakland California USA.
- 2016 AACA Brighton, England.
- 2016. ANZACA). (2016)
- 2017 BACA). Burton-Upon Trent, U.K.
- 2018 (BACA). Cambridge University, June 26th-June 28th, 2018.
- 2018 AACA George Washington University, Washington DC
- 2019 International Conference on Neurology, Neurosurgery and Stroke (Amsterdam)
- 2020 AACA National Meeting, American Association of Clinical Anatomy.
Weill Cornell Medicine
- 2021- AACA National MEETING

HOW CAN ABOVE BE ADJUGED RECENT/.

There at TJU is a colleague Dr. Guiyang Zhang MD., Ph.D , hired after me with little or no experience it teaching Anatomy promoted an ASSOCIATE PROFESSOR on or about 2018/19, with ALL HER INVITATIONS LIMITED TO JUST ONE SCIENTIFIC ANATOMY ASSOCIATION, -THE AMERICAN ASSOCIATION OF CLINICAL ANATOMISTS (AAA)

CONSTRASTED AGAINST DR.ZHANGS SCIENTIFIC MEETINGS, WHERE AND WHEN

Abstracts & Presentations

- Zhang,G. **Gaining Course.** American Association of Anatomists, Experimental Biology, San Diego, April 2-6, 2016.
- Zhang, G. AOA Research Symposium, Thomas Jefferson University, 2018
- Zhang, G. **in.** Sigma Xi Student Research Day, Thomas Jefferson University, April 10, 2018
- Zhang, G., Fenderson, B.A., Zuo, X. **Self-Directed Learning Modules Enhance** American Association of Anatomists, Experimental Biology, San Diego, CA, April 21-24, 2018
- Rana T, Laoteppitaks, C, Zhang, G, Troutman, G, Chandra S. **An Investigation** American Association of Anatomy, Experimental Biology, 2020.
- Tomatsu, S and Zhang, G. American Association of Anatomy, Experimental Biology (Virtual), April 27-30, 2021
- Zhang, G and Tomatsu, S. American Association of Anatomy, Experimental Biology (Virtual), April 27-30, 2021

2. TALK OF IMPACT

DR. ARIYO'S FEATURED PEER-REVIEWED PUBLICATIONS

REPORT OF MY SCHOLARSHIP.

Manuscripts Published (Peer Reviewed)

1. C.L. Mills, **O. Ariyo**, K., M. Yamada, J. W. Lash , and Ruth Bellairs. (1990). Evidence for the involvement of Receptors for Fibronectin in the Promotion of Chick Tail Segmentation. *Anat Embryol* 182(5):425-434

2. **Ariyo O (2015)** . A Segmental Hypoplastic Anterior Tibial Artery Coexisting with an Hypertrophied Perforating Fibular Artery. A Case Report and Clinical implications. *Int. J. Morphol.*, 33(1): 19-23.

3 **Ariyo O (2015)** Coupled Multiple Musculo-neurovascular Variations in Same Upper Limb. A Case Report and Clinical sSignificances. *Int. J Morphol.* 33(4):1406-1410.

4. **Ariyo O**, Fenderson, B. (2016). A Variant of the Classical Superficial Brachioulnoradial Artery. Morphology and Clinical Significances. *Journal Surgical and Radiologic Anatomy* 38 (6) DOI 10.1007/s00276-015-1605-6

5. **Ariyo O**, Shea JR. (2016). Bilateral Bifid Median Nerve. High Origin of Its Palmar Cutaneous Branch, Bifid Median Nerve in Association with Accessory Forearm Muscles and their clinical implications. *Int. J. Morphol.*, 34(3): 997-1001.

6. **Ariyo O**, Shea JR (2018). The Medial Brachial and Antebrachial Cutaneous Nerves of Posterior Cord Origin and Their Clinical Implications *Journal of Anatomy and Physiological Studies* April 2018

7 **Ariyo O**, (2018.) A High Origin Subscapular Trunk and its Clinical Implications *Anatomy & Physiology* May 2018

8. **Ariyo O**, Shea JR.(2018) Ulnar-Median Nerve Transposition: Embryology and Clinical Implications. *Anat Physiol* Vol. 8(6):311

9. **Ariyo O**. (2018). Raymond Shea Tortuosity in a Bilateral Brachioradial Artery of Dissimilar Arterial Origins and Clinical Implications *Anatomy and Physiological Studies J Anat Physiol* Volume 1(1):

10. **Ariyo, O**. (2019). A rare origin of the right vertebral artery and its clinical implications in a proximal occlusion to proximal origin to the brachiocephalic trunk. *Ann Cardiovasc Thorac Surg*. 2019 Volume 2 Issue 1

11 **Ariyo O. (2019)**A bifurcated axillary artery in its 2nd part and clinical implications *Olutayo Ariyo International Journal of AnatOMIC Variants*

****12. Ariyo O (2019) Bilateral Co-Existence of Le Minor Type 3 Variant With A 4-Root Median Nerve and Clinical Implications.** JRSR- 15406/2019

International Journal of Recent Scientific Reseach

****13. Ariyo O (2019) An Uncommon Arterial Trunk: Superficial Brachioradiomedian Artery and Its Clinical Significance**

SCIREA Journal of Clinical Medicine.

14.

***14 Ariyo O. (2019), A Rare Arterial Trunk : The Brachioradiomedian Artery and Its Clinical Implications.**

15, Ariyo O. 2020 A Rare Origin of the Dorsal Scapular Artery and Its Clinical Implications
Olutayo A

Journal of American Surgical Case Report. (AJSCR-2020-1-106

Received: 15 January, 2020

Accepted: 27 January, 2020

16.Ariyo O. An Absent Subscapular Artery Co-Existing with Multiple Variants of the Brachial Plexus and Clinical Implications. Cell and Developmental Biology.2020. ISSN-2168-9296

17. Ariyo O (2021) A Rare Formation of Lateral Cutaneous Nerve of the Forearm and its Clinical Significance in Anesthesiology Journal of Clinical Anesthesia and Pain Medicine

Received December 03, 2020; Accepted January 03, 2021; Published January 19, 2021

18 Ariyo O . 2021. Left Vertebral Artery with Proximal Stenosis and Clinical Implications.
Journal of Cardiology and Cardiovascular Interventions. Open Access

19. Ariyo O. 2021 Left Vertebral Artery with a Proximal Stenotic Origin and Clinical Implications Journal of Clinical Cardiology and Cardiovascular Interventions

December 10, 2020; Accepted: February 08, 2021; Published: February 16, 2021

20. Ariyo.O (3021) Multiple Morphological Radial Artery Variants with Odds of Increased Procedural Complications in Percutaneous Coronary Procedure and Clinical Implications.
Interventional Cardiology Journal 2021 : ISSN 2471-8157

IN CONTRAST.

DR.ZHANG'SFEATURED PEER-REVIEWED PUBLICATIONS

Lippincotts Illustrated Q&A Review of Histology

-
- Medical School Anatomy and Pathology Workshops for High School Students Enhance Learning and Provide Inspiration for Careers in Medicine. *Academic Pathology*, 2016, 3:1
- Equivalence of students' scores on timed and untimed anatomy practical examinations. *Anatomical Sciences Education*, 2013, 6:281
- A horseshoe kidney with a unique constellation of renal vasculature-a case report. *Int J Anat Var*, 2019, 12:2
- Bilateral accessory flexor muscle of the forearm giving rise to a variant head of the first lumbrical. *International Journal of Anatomical Variations*, 2015, 8: 4

Dr.ZHANG is a year away from being a FULL Professor

CONCERNS OVER MY TEACHING EFFECTIVENESS

A BRIEF BACKGROUND TO MY HIRING AT TJU.

- Falsehood and lies can easily be CONCOCTED, and can be made VIRAL for some HIDDEN, AGENDA.
- No one enjoyed this more than Prof.Schmidt, who in 2005 promised to hire me at the ASSISTANT Professor Level, and trusting him to his words which turned to a SUICIDAL PILL , offered me a Temporary Staus as a RESEARCH ASSOCIATEA while waiting he sent my CV and my Publications for FORMAL Credentialling by TJUProf.Schmidt then was Head of Anatomy Division and Vice Chairman Pathology, Anatomy and CELL Biology.
- By 2005, I had worked closely with Prof.Schmidt teaching ANATOMY at the dissecting Rooms where 95% of Anatomy is taught and Learnt.
- My competency was never in doubt in those 10 yearsishould be able to TRUST Prof.Schmidt to his words.Well Prof.Scmidt had a hidden Agenda.
- 1.GIVE A PROMISE OFFER A TEMPORARY POSITION AT THE RESEARCH ASSOCIATE POSITION, TELL DR.ARIYO TO ACCEPTING THIS
- THEN ABANDONED HIM AT THE LEVEL OF RESEARCH ASSOCIATE AT FINANCIAL COMPENSATION OF \$40000/YR BASE SALARY
- SADDLE DR .ARIYO WITH THE FULL RESPONSIBILITIES OF A FULL FACULTY
- ABANDON DR.ARIYO S A RESEARCH ASSOCIATE A POSITION
- THEN, then for the next 8 Years aACADEMICALLY AND FINANCIALLY EXPLOITED,

Generally in the US, MD, DO and PH. D seeking a career in Anatomy are hired entry level as an Assistant Professor (Exhibits culled)

- An ASSISTANT PROFESSOR SALARY AT TJU HOVERS AROU\$90000/YR BASE SALARY, A DIFFERENTIAL OF \$50000/YR , IN 8 YEARS AMOUNTED TO \$400000 (Four hundred Thousand dollars)
- \$10000 IN BENEFITS FROM TJU 403b CONTRIBUTIONS TO FACULY RETIREMENT AMOUNTING TO \$80/000 (Eighty Thousand dollars)

- SALARY AND BENEFITS DENIED AMOUNTED TO \$480,000)(Forty hundred and eighty thousand dollars
- ABOVE MAY BE SOMETHING PROF. SCHMIDT did NOT WANT KNOWN HENCE THE FALSEHOOD OF MY TEACHING INEFFECTIVENESS AND AN ATTEMPT IN YR-2011 DISMISSED (EXHIBIT)

DEBUNKING TEACHING INEFFECTIVENESS.

At this point , time to let TJU know of my TEACHING ACCOMPLISHMENTS BEFORE ARRIVING AT TJU.

AS a Medical Trainee Fellow, at the US oldest Medical School, prestigious University of Pennsylvania (UPENN)P

rof.John Weisel, the then Director of ANATOMY Program “I know Tayo. He was a good Instructor” “Tayo knows his ANATOMY”as communicated with TJU 2012

(Exhibit xxxx)

Excerpts from a letter from the then Chairman Anatomy on me.

(Exhibit. Xxxx)

On a Scale of 1-4- A student Evaluation – 4(Exhibit xxx)

At TJU,

Assigned to teach the first 2 Lectures in Anatomy (Back Anatomy and Spinal Cord) to incoming 1st Medical Students 2023-209 until when replaced by Prof .Schmidt . SON to a TRUSTEE had lamented “Prof.Schmidt, despite the high tuition we paid towards our Medical Education why is our 2 Lectures in the Medical School given by A B LACKMAN “This was how I got REPLACED, not REMOVED

With so much overwhelming Evaluation on students Evaluations acknowledging Dr. Ariyo as best teaching us CLINICAL ANATOMY

- A special `1hr Review of CLINICAL ANATOMY was set up by the DIVISION, penultimate week before any Major Exams at FOEDERER HALL between 5-6 PM.(CLASS OF 2020

Directed and solely supervised the 2 MOST ADVANCED COUSES IN ANATOMY at TJU.-

- ANAT.404. A much sought after ELECTIVE COURSE for 4th Year Medical Students. Surgical Anatomy to RESIDENTS IN ENT, Maxillo-facial, Dermatology and OTOLANYGOLOGY (2012-2022).

•

Thanks tAND A HUGE SALUTE TO A MAN OF HONOR-Prof. PEIPER.

A man of his words-

- HONORABLE

- His style of Administration, replicates what are needed, required of a HIGH PERFORMING ORGANISATION
- Environmentally friendly working and scholarly rewarding
- FAIRNESS
- OPENESS
- EMPOWERED OTHERS
- ASSOCIATION OF JUNIOR FACULTY ACKNOWLEDGED-FREQUENT MEETINGS
- Encourages Members to share EXPERIENCES.
- SCHOLARSHIP VERY WELL SUPPORTED, BY THIS ADMINISTRATION MORALLY, FINANCIALLY,
- LOCAL, NATIONAL INTERNATIONAL INVITATIONS -WELL SUPPORTED, BY THIS ADMINISTRATION , MORALLY, FINANCIALLY NO EXCEPTIONS
- EMPOWERED OTHERS- Well, good for Organizational growth ---- Unfortunately - others may use this empowerment conferred on them as POWER ABUSE- that may have robbed on his Administration negatively

THE MOSES SENT MY WAY,BUT THE POND WAS ALREADY OVERPOPULATED WITH TOO MANY REVENGING SHARKS AND SOME DEMANDING THEIR POUND OF FLESH---- BUT OVERALL

HE DID HIS BEST.

IN SUMMARY.

We ALL pass through this life once.Lives ruined may be irrevocably damaged, and no financial compensation can obliterate the anguished and collateral damages .

TO TJU, I can itemize close to or more than \$500000 DENIED from.

- **MISDESIGNATION**
- **DELAYED PROMOTIONS**
- **DENIED PROMOTIONS**

FAIRNESS IS FAIRNESS. ON IMPACT: AACA INVITATION RECEIVED IN 2020

On behalf of the Association we are contacting you **to ask for your assistance with what we believe is one of the most important elements in organizing the scientific sessions for the 2020 AACA Annual Meeting in New York, reviewing abstracts** I cannot be more PROUD of this RECOGNITION so HONORED and even in 2021, another INVITATION by AACA another Invitation to serve a JUDGE in deciding the Award winning BEST STUDENT's PLATFORM **AT THE HEIGHT OF COVID. With FACE TO FACE GOT REPLACED BY VISUAL TEACHING** Olutayo Ariyo MBBS., MBA, with Recent BILATERAL KNEE SURGERY , at age 69 PUT his life on the line CHAMPIONED HYBRID TEACHING, going to the DISSECTING ROOM TO DO DISSECTION BY SELF

STUDENTS CAME IN IN SMALL GROUPS, WELL PPE GOWNED, MAINTAINED SAFE DISTANCES and was taught Anatomy the BEST WAY to learn this.

MY PASSION

I HAD CHOICES FOR BETTER FINANCIAL REWARDS

-More financially rewarding CLINICAL PRACTICE

DECLINED SEVERAL OFFERS OF SIX FIGURES EARNING AFTER MY MBA DIPLOMA.

My foray into Academics especially ,

TO DO WHAT ANATOMISTS DO.

Anatomy is what Anatomists do.

I, Olutayo Ariyo, MBBS., MBA pray that a right to sue letter be issued to enable me pursue my right to redress for the racial , hiring and pay discriminations, the inappropriately and intentionally delayed Promotion from the Instructor to Clinical Assistant Professor, the MISDESIGNATION as a RESEARCH ASSOCIATE A as an OFFICER OF TJU, a VICE CHAIRMAN, would not honor pledge made, and as such everything about my employment were subjected to multiple Bandwagon effects and untold COLLATERAL DAMAGES, Huge financial loss and Jefferson descending to denigrate my accomplishments including having doubts over my Teaching effectiveness, the Director who solely supervised the most advanced ANATOMY COURSE TO SURGICAL RESIDENTS with perfect Scores on their Evaluation sheets? .TJU may chose to not rewarding and giving me the FULL PROFESSOR I BELIEVE I HAVE EARNED. AND MERITORIOUSLY TOO.

How about having 2 EMERITUS Professors agreeing to write a Recommendations when seeking a promotion to the CLINICAL ASSISTANT PROFESSOR?.

Let the world ask them what they saw in my scholarship and not a denial of a Promotion because a Student alleged I rolled my eyes at her for giving a wrong answer to a question she has asked- NOT DR.ARIYO, that compassionate "SOLID, HIGHLY INTELLIGENT, VERY FRIENDLY TEACHER, Most reputed EVENING VISITS TO ASSIST STUDENTS IN THE LAB, and a proud to an AN IVY LEAGUE SCHOLAR TODAY

an Attending Pediatrician, who I can prodly say was voted Best RESIDENTS at Graduating? She kows too well the compassion I have for Students generally when TJU Students run int her and ask "Is Dr.Ariyo your DAD?.

When I NORMALLY TRIAGE STUDENTS AFTER their 1st Exams and I would normally step ed up to individually help in teaching ANATOMY, Of my MY TIME , in the evenings teaching structures, relationships. Glad to report on some of their comments on EVALUATION SHEETS

"DR.ARIYO, but were it not for you,,,,," Dr.Ariyo, wish I had met you earlier.....)

TITLE ALONE may not DEFINE ME IN ACADEMIA- but

- Those 19 PUBLICATIONS IN 6 YEARS (2015-20210 in a more friendly, working environment, provided under the Prof. PEIPER Administration
- ALL 19 PEER REVIEWED PUBLICATIONS, I was 1st AUTHOR.14 OF WHICH the FIRST AUTHOR .

Olutayo Ariyo MBBS., MBA

(610) 931 7383.

From: JONATHAN ZAHARIN
To: tmajor33@hotmail.com
Subject: Appointment Time for EEOC Case 530-2023-04067
Date: Monday, April 3, 2023 1:22:00 PM
Attachments: [image001.png](#)

Good Afternoon Mr. Ariyo,

Please see the details of your scheduled intake appointment below.

EEOC Number: 530-2023-04067
Appointment Type: By Phone
Appointment Time: 02:30 PM, 04/04/2023
Status: Active

If you have any questions or concerns, please do not hesitate to contact me.

Respectfully,

Jonathan Zaharin

Jonathan Zaharin
EEOC Philadelphia District Office
801 Market Street, Suite 1000
Philadelphia, PA 19107
(267) 589-9793



From: PDOContact
To: "Olutayo Ariyo"
Subject: RE: Olutayo Ariyo MBBS., MBA Vs THOMAS JEFFERSON UNIVERSITY PHILADELPHIA PA 19107
Date: Monday, April 3, 2023 11:32:00 AM
Attachments: ~WRD000.jpg
image001.jpg

Good Morning Mr. Ariyo,

Thank you for your email. The information you provided will be uploaded to your case file. Feel free to let us know if you may have any questions or if you feel we may be of any assistance.

Respectfully,

Jonathan Zaharin

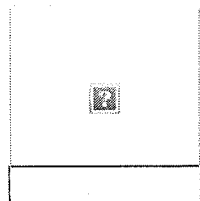
Jonathan Zaharin
EEOC Philadelphia District Office
801 Market Street, Suite 1000
Philadelphia, PA 19107
(267) 589-9793



From: Olutayo Ariyo <tmajor33@hotmail.com>
Sent: Saturday, April 1, 2023 4:15 PM
To: PDOContact <PDOContact@eeoc.gov>
Cc: Olutayo Ariyo <tmajor33@hotmail.com>
Subject: Olutayo Ariyo MBBS., MBA Vs THOMAS JEFFERSON UNIVERSITY PHILADELPHIA PA 19107

You don't often get email from tmajor33@hotmail.com. [Learn why this is important](#)

CAUTION: The sender of this message is external to the EEOC network. Please use care when clicking on links and responding with sensitive information. Forward suspicious emails to phishing@eeoc.gov.



TO EEOC.

MY Case was that of an Academic Career dislocated, scuttled, educationally and financially exploited, other colleagues with less experience, less scholarly outputs to show for but are in accelerated promotions. Seems at TJU in the Education Track, all you need to do to get promoted is to rely on positive STUDENTS evaluations. I had many, but in addition a proud scholarly records despite all weapons fashioned.

International Recognitions not required until seeking the FULL PROFESSOR Rank. I was regularized as a FORMAL FACULTY IN 2013/14. Same year I started earning International Recognitions. A colleague of mine is Dr. Zhang, with no invitations except to American Association of ANATOMY (AAA), while my invitations were as diverse ranging from

American Association of Clinical Anatomists

European

AS

British

ANZ .

What is in the mind of TJU that they have concerns over teaching effectiveness in a Faculty, but this Faculty was made the Director at the highest level of Anatomy Teaching iAnatomy-Surgical Anatomy in Head and Neck to Residents in ent, Maxillofacial, Dermatology and Otolaryngology teaching receiving perfect Scores 10/10 in Evaluations from these Residents. Somewhere, somehow, the truth is not being told.

I am respectfully requesting EEOC issue /grant me the right to sue letter to seek redress for these litany of harm, discriminations, misdesignations, in the delay and denying me well earned significant Status of FULL Professor., I have attached many Exhibits to support my claims and look forward to be invited for an Interview soon, taking into consideration that I initially submitted my Complaints to EEOC on 12/28/2022. I am fully rejecting the arm twisting or intimidation of a promotion even to a lower Status of the Associate Professor less that that of FULL Professor that had to be contingent to giving up my rights. I have an HONOR to preserve and a tainted porridge is not an enticement to warrant me giving up my rights to seek redress for ruinage of a brilliant academic career I am ready to defend before an unbiased group of chosen experts in the field of Human Anatomy, worldwide.

Thanks.

Sincerely,

Olutayo Ariyo MBBS, MBA

Below are 3 Current openings for the Position of Assistant Professor culled from American Association of CLINICAL ANATOMISTS (AACA)

**1. Rocky Mountain University of Health Professions
Anatomy Faculty**

**2. University of Toronto
Assistant Professor, Teaching Stream - Anatomy
Division of Anatomy, Department of Surgery**

**3. University of Toledo College of Medicine and Life
Sciences
Assistant Professor Anatomy
Department of Medical Education**

**Rocky Mountain University of Health Professions
Anatomy Faculty**

Job Description

Anatomy department faculty are responsible for academic, service, and scholarship matters consistent with the mission and philosophy of the anatomy department. Faculty members participate in university governance and assist the department to plan, coordinate, facilitate, administer, and monitor all activities related to the anatomy department.

Responsibilities

Instruction, curriculum/course development, and classroom management

- Design courses and/or course content collaboratively with programs to meet needs (or something similar)

- Structure course syllabi to correspond with the program curriculum and course outcomes. Faculty member will teach in professional programs and should be comfortable team teaching with other Anatomy faculty.
- Model effective oral and written communications that engage the students, provide clarity, and improve student learning.
- Set clear expectations for the course by publishing course terminal objectives, assignment/examinations dates, and weights the distribution of various evaluation categories.
- Ensure that the content and level of material included on all assessments correspond to the course terminal objectives.
- Regularly assess each course and the instruction that is offered.
- Demonstrate consistency and fairness in the preparation and grading of exams and provide timely feedback to students.
- Maintain regular office hours for student advising and consultation.
- Contribute to laboratory instruction and dissection of human cadavers in the anatomy laboratory.

Scholarship

- Maintain an ongoing scholarly activity plan
- Meet all university expectations for scholarly productivity

Administrative/Service

- Contribute to service in the university, department, and professions.
- Participate in all necessary department faculty meetings and meetings with other departments/programs as appropriate.
- Contribute to the development and growth of the Department of Anatomy.

Other

- Maintain a personal professional development plan.
- Perform other duties as assigned.

Position Competencies

- Communication
- Development of Self
- Job Knowledge/Skill Application
- Champions Innovation
- Drives for Results
- Collaboration
- Integrity
- Critical Thinking
- Initiative
- Student/Customer-Centeredness
- Develops & Inspires Others
- Develops Strategic Perspective
- Financial Accountability

Qualifications

Education/Certification: PhD in Anatomy or relevant field, or equivalent MD.

Required Knowledge: Familiar with imaging of the human body. Familiar with digital resources for teaching anatomy.

Experience Required: Experience in teaching human cadaver anatomy.

Skills/Abilities: Ability to effectively present to students and other groups. Excellent research skills; analytical and problem-solving skills; great attention to detail; and advanced teaching skills. Display ethical and professional behavior. Ability to work effectively with a variety of university and other personnel.

Physical Activities and Requirements of this Position

University of Toronto

Assistant Professor, Teaching Stream - Anatomy

Division of Anatomy, Department of Surgery

Date Posted: 03/03/2023

Closing Date: 04/13/2023, 11:59PM ET

Req ID: 28821

Job Category: Faculty - Teaching Stream (continuing)

Faculty/Division: Temerty Faculty of Medicine

Department: Dept of Surgery

Campus: St. George (Downtown Toronto)

Description:

The Division of Anatomy, Department of Surgery in the Temerty Faculty of Medicine at the University of Toronto, St. George campus invites applications for a teaching stream position at the rank of Assistant Professor, Teaching Stream. The anticipated appointment start date is July 1, 2023, or shortly thereafter.

Qualified applicants must have a PhD in an anatomy-related field by the date of the appointment. **Alternatively, applicants who have a clinical professional degree (e.g. MD, DDS)** by the date of appointment will also be considered. An exceptional knowledge of gross anatomy, histology and neuroanatomy and a demonstrated record of excellence in teaching at the university level is required. Teaching excellence may be demonstrated through a combination of teaching accomplishments, awards and accolades, creative educational leadership and/or achievement, innovative teaching initiatives, presentations at significant conferences, the teaching portfolio and student evaluations submitted as part of the application, as well as strong endorsements from referees of high standing.

**University of Toledo College of Medicine and Life Sciences
Assistant Professor Anatomy
Department of Medical Education**

Position Description for Assistant Professor of Medical Education

Position description: The Department of Medical Education at University of Toledo College of Medicine and Life Sciences (UTCOMLS) **is seeking applications for a full-time, tenure-track faculty position at the rank of Assistant Professor with experience teaching anatomy and neuroanatomy.** The desired candidate will teach in a highly integrated, systems-based, hybrid curriculum that incorporates active learning strategies in small and large group settings. We seek an outstanding team-oriented educator who will share our excitement in contributing to this dynamic and innovative educational program by providing leadership and instruction for the MD, graduate allied health professional, and undergraduate students. The successful candidate will work closely with the MD curriculum leaders and allied health professional programs to deliver appropriate anatomy education using multiple teaching modalities. The successful candidate will work with an interdisciplinary team of clinicians and faculty to teach, as well as develop and disseminate scholarship in medical education and related fields.

General Responsibilities:

- Teaching responsibilities include delivery of lecture, various active learning pedagogies, and instruction in cadaveric anatomy labs (dissection and prosection) for the MD, PA, and undergraduate neuroscience programs.
- Develop and implement anatomy content, including multimedia recordings, for graduate allied health professional students. Collaborate with graduate program leadership to develop learning objectives and assessments.
- Establish learning objectives and competency standards for anatomy education for medical students and pharmacy students. Contribute to the process of student assessment, development, implementation, and evaluation of assessment materials and procedures.
- Perform administrative duties, such as course director or discipline director, as negotiated and assigned. Participate in medical school committee service.
- Candidates are also expected to actively participate in research activities that results in scholarly dissemination through presentations at regional and national conferences and publications in peer-reviewed journals. Individuals with research interests in anatomy or plastination or in the scholarship of teaching and learning within the health professions are particularly encouraged to apply.
- The position provides an opportunity to collaborate on development of educational resources, presentation of continuing education programs, and mentoring of medical, graduate, and undergraduate students.

Additional Qualifications:

- Applicants will have earned a MD, DO, or Ph.D. with teaching experience in anatomy or a related field
- Possess a record of excellence in teaching gross anatomy and neuroanatomy
- Demonstrate teaching experience that incorporates different methods of instruction including dissection and/or prosection, team-based learning, case-based learning, or other forms of active learning. A background in the use of technology in teaching as well as anatomy curriculum development is preferred.
- Additional experience teaching embryology, histology, and/or pathology is highly desired.
- Ability to work effectively in teams

- Strong interpersonal and communication skills
- Ability to provide formative feedback to medical students/pharmacy students as needed
- Knowledge of assessment strategies related to medical education
- Ability to utilize peer and student feedback in enhancing curriculum as needed

To Apply:

Application materials including cover letter, curriculum vitae, teaching philosophy, and a list of three references can be emailed directly to Wendy.Lackey-Cornelison@utoledo.edu Or apply directly online by visiting <https://secure.dc4.pageuppeople.com/apply/1086/gateway/Default.aspx?c=apply&sJobIDs=495318&SourceTypeID=796&sLanguage=en-us>

Below are 3 Current openings for the Position of Assistant Professor culled from American Association of CLINICAL ANATOMISTS (AACA)

**1. Rocky Mountain University of Health Professions
Anatomy Faculty**

**2. University of Toronto
Assistant Professor, Teaching Stream - Anatomy
Division of Anatomy, Department of Surgery**

**3. University of Toledo College of Medicine and Life
Sciences
Assistant Professor Anatomy
Department of Medical Education**

**Rocky Mountain University of Health Professions
Anatomy Faculty**

Job Description

Anatomy department faculty are responsible for academic, service, and scholarship matters consistent with the mission and philosophy of the anatomy department. Faculty members participate in university governance and assist the department to plan, coordinate, facilitate, administer, and monitor all activities related to the anatomy department.

Responsibilities

Instruction, curriculum/course development, and classroom management

- Design courses and/or course content collaboratively with programs to meet needs (or something similar)

- Structure course syllabi to correspond with the program curriculum and course outcomes. Faculty member will teach in professional programs and should be comfortable team teaching with other Anatomy faculty.
- Model effective oral and written communications that engage the students, provide clarity, and improve student learning.
- Set clear expectations for the course by publishing course terminal objectives, assignment/examinations dates, and weights the distribution of various evaluation categories.
- Ensure that the content and level of material included on all assessments correspond to the course terminal objectives.
- Regularly assess each course and the instruction that is offered.
- Demonstrate consistency and fairness in the preparation and grading of exams and provide timely feedback to students.
- Maintain regular office hours for student advising and consultation.
- Contribute to laboratory instruction and dissection of human cadavers in the anatomy laboratory.

Scholarship

- Maintain an ongoing scholarly activity plan
- Meet all university expectations for scholarly productivity

Administrative/Service

- Contribute to service in the university, department, and professions.
- Participate in all necessary department faculty meetings and meetings with other departments/programs as appropriate.
- Contribute to the development and growth of the Department of Anatomy.

Other

- Maintain a personal professional development plan.
- Perform other duties as assigned.

Position Competencies

- Communication
- Development of Self
- Job Knowledge/Skill Application
- Champions Innovation
- Drives for Results
- Collaboration
- Integrity
- Critical Thinking
- Initiative
- Student/Customer-Centeredness
- Develops & Inspires Others
- Develops Strategic Perspective
- Financial Accountability

Qualifications

Education/Certification: PhD in Anatomy or relevant field, or equivalent MD.

Required Knowledge: Familiar with imaging of the human body. Familiar with digital resources for teaching anatomy.

Experience Required: Experience in teaching human cadaver anatomy.

Skills/Abilities: Ability to effectively present to students and other groups. Excellent research skills; analytical and problem-solving skills; great attention to detail; and advanced teaching skills. Display ethical and professional behavior. Ability to work effectively with a variety of university and other personnel.

Physical Activities and Requirements of this Position

University of Toronto

Assistant Professor, Teaching Stream - Anatomy Division of Anatomy, Department of Surgery

Date Posted: 03/03/2023

Closing Date: 04/13/2023, 11:59PM ET

Req ID: 28821

Job Category: Faculty - Teaching Stream (continuing)

Faculty/Division: Temerty Faculty of Medicine

Department: Dept of Surgery

Campus: St. George (Downtown Toronto)

Description:

The Division of Anatomy, Department of Surgery in the Temerty Faculty of Medicine at the University of Toronto, St. George campus invites applications for a teaching stream position at the rank of Assistant Professor, Teaching Stream. The anticipated appointment start date is July 1, 2023, or shortly thereafter.

Qualified applicants must have a PhD in an anatomy-related field by the date of the appointment. **Alternatively, applicants who have a clinical professional degree (e.g. MD, DDS)** by the date of appointment will also be considered. An exceptional knowledge of gross anatomy, histology and neuroanatomy and a demonstrated record of excellence in teaching at the university level is required. Teaching excellence may be demonstrated through a combination of teaching accomplishments, awards and accolades, creative educational leadership and/or achievement, innovative teaching initiatives, presentations at significant conferences, the teaching portfolio and student evaluations submitted as part of the application, as well as strong endorsements from referees of high standing.

**University of Toledo College of Medicine and Life Sciences
Assistant Professor Anatomy
Department of Medical Education**

Position Description for Assistant Professor of Medical Education

Position description: The Department of Medical Education at University of Toledo College of Medicine and Life Sciences (UTCOMLS) **is seeking applications for a full-time, tenure-track faculty position at the rank of Assistant Professor with experience teaching anatomy and neuroanatomy.** The desired candidate will teach in a highly integrated, systems-based, hybrid curriculum that incorporates active learning strategies in small and large group settings. We seek an outstanding team-oriented educator who will share our excitement in contributing to this dynamic and innovative educational program by providing leadership and instruction for the MD, graduate allied health professional, and undergraduate students. The successful candidate will work closely with the MD curriculum leaders and allied health professional programs to deliver appropriate anatomy education using multiple teaching modalities. The successful candidate will work with an interdisciplinary team of clinicians and faculty to teach, as well as develop and disseminate scholarship in medical education and related fields.

General Responsibilities:

- Teaching responsibilities include delivery of lecture, various active learning pedagogies, and instruction in cadaveric anatomy labs (dissection and prosection) for the MD, PA, and undergraduate neuroscience programs.
- Develop and implement anatomy content, including multimedia recordings, for graduate allied health professional students. Collaborate with graduate program leadership to develop learning objectives and assessments.
- Establish learning objectives and competency standards for anatomy education for medical students and pharmacy students. Contribute to the process of student assessment, development, implementation, and evaluation of assessment materials and procedures.
- Perform administrative duties, such as course director or discipline director, as negotiated and assigned. Participate in medical school committee service.
- Candidates are also expected to actively participate in research activities that results in scholarly dissemination through presentations at regional and national conferences and publications in peer-reviewed journals. Individuals with research interests in anatomy or plastination or in the scholarship of teaching and learning within the health professions are particularly encouraged to apply.
- The position provides an opportunity to collaborate on development of educational resources, presentation of continuing education programs, and mentoring of medical, graduate, and undergraduate students.

Additional Qualifications:

- Applicants will have earned a MD, DO, or Ph.D. with teaching experience in anatomy or a related field
- Possess a record of excellence in teaching gross anatomy and neuroanatomy
- Demonstrate teaching experience that incorporates different methods of instruction including dissection and/or prosection, team-based learning, case-based learning, or other forms of active learning. A background in the use of technology in teaching as well as anatomy curriculum development is preferred.
- Additional experience teaching embryology, histology, and/or pathology is highly desired.
- Ability to work effectively in teams

- Strong interpersonal and communication skills
- Ability to provide formative feedback to medical students/pharmacy students as needed
- Knowledge of assessment strategies related to medical education
- Ability to utilize peer and student feedback in enhancing curriculum as needed

To Apply:

Application materials including cover letter, curriculum vitae, teaching philosophy, and a list of three references can be emailed directly to Wendy.Lackey-Cornelison@utoledo.edu Or apply directly online by visiting <https://secure.dc4.pageuppeople.com/apply/1086/gateway/Default.aspx?c=apply&sjobIDs=495318&SourceTypeID=796&sLanguage=en-us>

From: Olutayo Ariyo
To: PDOContact
Subject: Re: Olutayo Ariyo MBBS., MBA Vs THOMAS JEFFERSON UNIVERSITY PHILADELPHIA PA 19107
Date: Tuesday, April 4, 2023 5:49:13 AM
Attachments: ~WRD000.jpg
image001.jpg
ACA CURRENT ADVERTIZED OPENINGS FOR ASSISTANT Professor in ANATOMY..docx

You don't often get email from tmajor33@hotmail.com. [Learn why this is important](#)

XXXX4 4 2023 EEOC DOCUMENTS 3 24 23 [Autosaved].pptx

Please find attached 1. Current samples of Openings for entry leve as an Asistant Professor in ANATOMY and their respective Qualifications

xxxxx 4 4 23 is to override 3 24 23 sent earlier relating to EXHIBITS attached.
Thanks.

olutayo Ariyo MBBS., MBA.

From: PDOContact <PDOContact@eeoc.gov>
Sent: Monday, April 3, 2023 3:32 PM
To: Olutayo Ariyo <tmajor33@hotmail.com>
Subject: RE: Olutayo Ariyo MBBS., MBA Vs THOMAS JEFFERSON UNIVERSITY PHILADELPHIA PA 19107

Good Morning Mr. Ariyo,

Thank you for your email. The information you provided will be uploaded to your case file. Feel free to let us know if you may have any questions or if you feel we may be of any assistance.

Respectfully,
Jonathan Zaharin
Jonathan Zaharin
EEOC Philadelphia District Office
801 Market Street, Suite 1000
Philadelphia, PA 19107
(267) 589-9793

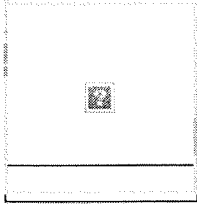


From: Olutayo Ariyo <tmajor33@hotmail.com>
Sent: Saturday, April 1, 2023 4:15 PM
To: PDOContact <PDOContact@eeoc.gov>
Cc: Olutayo Ariyo <tmajor33@hotmail.com>
Subject: Olutayo Ariyo MBBS., MBA Vs THOMAS JEFFERSON UNIVERSITY PHILADELPHIA PA 19107

You don't often get email from tmajor33@hotmail.com. [Learn why this is important](#)

CAUTION: The sender of this message is external to the EEOC network. Please use care when

clicking on links and responding with sensitive information. Forward suspicious emails to phishing@eeoc.gov.



4 1 2023 EEOC DOCUMENTS 3 24 23 [Autosaved].pptx

TO EEOC.

MY Case was that of an Academic Career dislocated, scuttled, educationally and financially exploited, other colleagues with less experience, less scholarly outputs to show for but are in accelerated promotions. Seems at TJU in the Education Track, all you need to do to get promoted is to rely on positive STUDENTS evaluations. I had many, but in addition a proud scholarly records despite all weapons fashioned.

International Recognitions not required until seeking the FULL PROFESSOR Rank. I was regularized as a FORMAL FACULTY IN 2013/14. Same year I started earning International Recognitions. A colleague of mine is Dr. Zhang, with no invitations except to American Association of ANATOMY (AAA), while my invitations were as diverse ranging from

American Association of Clinical Anatomists

European

AS

British

ANZ.

What is in the mind of TJU that they have concerns over teaching effectiveness in a Faculty, but this Faculty was made the Director at the highest level of Anatomy Teaching (Anatomy-Surgical Anatomy in Head and Neck to Residents in ENT, Maxillofacial, Dermatology and Otolaryngology teaching receiving perfect Scores 10/10 in Evaluations from these Residents. Somewhere, somehow, the truth is not being told.

I am respectfully requesting EEOC issue /grant me the right to sue letter to seek redress for these litany of harm, discriminations, misdesignations, in the delay and denying me well earned significant Status of FULL Professor. I have attached many Exhibits to support my claims and look forward to be invited for an Interview soon, taking into consideration that I initially submitted my Complaints to EEOC on 12/28/2022. I am fully rejecting the arm twisting or intimidation of a promotion even to a lower Status of the Associate Professor less that that of FULL Professor that had to be contingent to giving up my rights. I have an HONOR to preserve and a tainted porridge is not an enticement to warrant me giving up my rights to seek redress for ruinage of a brilliant academic career I am ready to defend before an unbiased group of chosen experts in the field of Human Anatomy, worldwide.

Thanks.

Sincerely,

Olutayo Ariyo MBBS, MBA

From: MAIASIA GRIMES
To: Tmajor33@hotmail.com
Subject: EEOC Inquiry No. 530-2023-04067 Request to File
Date: Friday, April 7, 2023 4:00:00 PM

Dear **Olutayo Ariyo**:

Please note, a Charge of discrimination has been drafted and is available for your review in the EEOC Portal. In order for the EEOC to process your Charge of discrimination you will need to approve the Charge drafted in the portal. If you do not approve your Charge of Discrimination within seven (7) days of the date of this e-mail or to contact me within that same 7-day period, if there is need for further clarification, then this office *will administratively close your inquiry* without any further processing and you *will not* be issued a "Notice of Rights."

If there are any questions in this matter, please do not hesitate to contact me.

Respectfully,
Maiasia Grimes
Federal Investigator
U.S. Equal Employment Opportunity Commission
Philadelphia District Office
801 Market Street
Suite 1000
Philadelphia, PA 19107
267-589-9738

Access your Charge via EEOC Portal:

<https://publicportal.eeoc.gov/portal/>

Click on "My Cases"

Technical Support:

[US EEOC](#)

Freedom of Information Act Request:

[EEOC FOIA](#)

Confidentiality Notice: The information contained in this e-mail and any attachments may be confidential or privileged under applicable law, or otherwise may be protected from disclosure to anyone other than the intended recipient(s). Any use, distribution, or copying of this e-mail, including any of its contents or attachments by any person other than the intended recipient, or for any purpose other than its intended use, is strictly prohibited. If you believe you have received this e-mail in error: permanently delete the e-mail and any attachments, and do not save, copy, disclose, or rely on any part of the information contained in this e-mail or its attachments. Please call 267-589-9738 if you have questions.

From: MAIASIA GRIMES
To: Tmajor33@hotmail.com
Subject: EEOC Charge No 530-2023-04067 No Contact Letter
Date: Monday, April 24, 2023 5:07:00 PM
Attachments: 2023-4-24 CP No Contact Letter.pdf

Hello Mr. Olutayo Ariyo,

Please see the attached correspondence.

Respectfully,
Maiasia Grimes
Federal Investigator
U.S. Equal Employment Opportunity Commission
Philadelphia District Office
801 Market Street
Suite 1000
Philadelphia, PA 19107
267-589-9738

Access your Charge via EEOC Portal:

<https://publicportal.eeoc.gov/portal/>

Click on "My Cases"

Technical Support:

[US EEOC](#)

Freedom of Information Act Request:

[EEOC FOIA](#)

Confidentiality Notice: The information contained in this e-mail and any attachments may be confidential or privileged under applicable law, or otherwise may be protected from disclosure to anyone other than the intended recipient(s). Any use, distribution, or copying of this e-mail, including any of its contents or attachments by any person other than the intended recipient, or for any purpose other than its intended use, is strictly prohibited. If you believe you have received this e-mail in error: permanently delete the e-mail and any attachments, and do not save, copy, disclose, or rely on any part of the information contained in this e-mail or its attachments. Please call 267-589-9738 if you have questions.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Philadelphia District Office

801 Market Street, Suite 1000
Philadelphia, PA 19107-3126
Intake Information Group: (800) 669-4000
Intake Information Group TTY: (800) 669-6820
Philadelphia Direct Dial: (267) 589-9700
FAX (215) 440-2606, 2632, 2822 & 2604
Website: www.eeoc.gov

April 24, 2023

Our Reference: Olutayo Ariyo v Thomas Jefferson University
EEOC Charge No. 530-2023-04067

Olutayo Ariyo
1016 Yeadon Avenue
Yeadon, PA 19050

Dear Olutayo Ariyo,

This letter is sent to you in reference to your correspondence and subsequent communication with this office in which you alleged employment discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended, by the above-named Respondent.

In your charge, you allege that the Respondent discriminated against you because of your national origin when they refused to promote you to Full Professorship. A review of the available evidence shows that within the period of timeliness you suffered no adverse action and were offered a promotion before your resignation.

To date, I have been unable to reach you by phone at 610-931-7383 on 4/21/2023 and 4/24/2023. The purpose of the call was to advise you of my final recommendation that the evidence provided to the Commission, does not support a violation of the statute. This does not certify that Respondent is in compliance with the statutes. While we fully understand that the parties to a charge often have very firm views that the available evidence supports their respective positions, our final determinations must comport with our interpretations of the available evidence at the time a final decision is made.

Although a recommendation has now been made, the final authority as to a determination rests with the District Director or her designees. If after reviewing, the District Director concurs with the recommendation, you will receive a Determination and Notice of Rights from our office. The suit rights will give you the ability to further pursue your claim in court.

Sincerely,

A handwritten signature in black ink, appearing to read "MG", is located below the "Sincerely," text.

Maiasia Grimes
Investigator

cc:

00324

From: Kurt Jung
To: ELIZABETH WJASOW
Subject: Ariyo v. Thomas Jefferson University; 530-2023-04067
Date: Tuesday, October 10, 2023 4:44:32 PM
Attachments: [image001.png](#)

You don't often get email from kjung@malamutlaw.com. [Learn why this is important](#)

CAUTION: The sender of this message is external to the EEOC network. Please use care when clicking on links and responding with sensitive information. Forward suspicious emails to phishing@eeoc.gov.

Dear Ms. Wjasow,

Our law firm represents Charging Party in the above matter. Please provide me with the charge of discrimination and the notice of rights in the above matter.

Kurt J. Jung, Esq.
Labor and Employment
E: kjung@malamutlaw.com
O: (856) 424-1808
F: (856) 424-2032
W: www.malamutlaw.com



This message and attachment(s) are intended solely for use by the addressee and may contain information that is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not the intended recipient or agent thereof responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone and with a 'reply' message. Thank you for your cooperation.

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

From: ELIZABETH WJASOW
To: Kurt Jung
Subject: RE: Ariyo v. Thomas Jefferson University; 530-2023-04067
Date: Tuesday, October 10, 2023 5:04:00 PM
Attachments: [530-2023-04067_ChargeOfDiscrimination.pdf](#)
[2023-04-26 NRTS for 530-2023-04067.pdf](#)
[image002.png](#)
[image003.png](#)

Dear Mr. Jung,

Please see attached.

Sincerely,

(Miss) Elizabeth Wjasow ("Jäysö") she/her/hers
Senior Equal Opportunity Investigator
State, Local and Tribal Program
Equal Employment Opportunity Commission
Philadelphia District Office
801 Market Street, Suite 1000
Philadelphia, PA 19107
(267) 589-9728 (phone)
(215) 440-2604 (fax)
Elizabeth.Wjasow@eeoc.gov
PHLStateandLocal@eeoc.gov



From: Kurt Jung <kjung@malamutlaw.com>
Sent: Tuesday, October 10, 2023 4:44 PM
To: ELIZABETH WJASOW <ELIZABETH.WJASOW@EEOC.GOV>
Subject: Ariyo v. Thomas Jefferson University; 530-2023-04067

You don't often get email from kjung@malamutlaw.com. [Learn why this is important](#)

CAUTION: The sender of this message is external to the EEOC network. Please use care when clicking on links and responding with sensitive information. Forward suspicious emails to phishing@eeoc.gov.

Dear Ms. Wjasow,

Our law firm represents Charging Party in the above matter. Please provide me with the charge of discrimination and the notice of rights in the above matter.

Kurt J. Jung, Esq.
Labor and Employment
E: kjung@malamutlaw.com
O: (856) 424-1808
F: (856) 424-2032
W: www.malamutlaw.com



This message and attachment(s) are intended solely for use by the addressee and may contain information that is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not the intended recipient or agent thereof responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by telephone and with a 'reply' message. Thank you for your cooperation.

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.	Charge Presented To: _____ Agency(ies) Charge No(s): EEOC 530-2023-04067 FEPA
Pennsylvania Human Relations Commission and EEOC _____ <i>State or local Agency, if any</i>	

I Name (indicate Mr., Ms., Mrs., Miss, Mx., Dr., Hon., Rev.) Dr. OLUTAYO ARIYO		Home Phone 610-931-7383	Year of Birth
Street Address 1016 YEADON AVENUE YEADON, PA 19050			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name THOMAS JEFFERSON UNIVERSITY		No Employees, Members 501+ Employees	Phone No
Street Address 1020 LOCUST ST WM PENN ANX W, PA 19107			
Name 		No Employees, Members 	Phone No
Street Address 		City, State and ZIP Code 	
DISCRIMINATION BASED ON 		DATE(S) DISCRIMINATION TOOK PLACE Earliest _____ Latest _____ 06/30/2022 06/30/2022	
National Origin 			
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I. I was hired by Thomas Jefferson University in 1995 as Post-Doc. I resigned in 2022 as an Assistant Professor. I am Nigerian. II. I was hired by Thomas Jefferson University, initially as Past-Time Post.Doc supervising human Gross anatomy dissections to 1st Year Medical Students, and in 2005 offered a stop-gap position as a Research Associate position with a \$40000/year base salary, while awaiting a recommendation for a full permanent Faculty position as an Assistant Professor promised by Prof. Schmidt, then Vice Chairman of the Dept. of Pathology, Anatomy and Cell Biology, requesting a submission of my CV and copy of any Publication which I complied with. Prof. Schmidt reneged on promise but got saddled with full responsibilities of a Faculty. TJU advertised and listed me as one, but was paid at Research Associate A status, a differential pay difference of about \$52000 annually for 8 years when compared to the about \$92000 /yr base salary paid an Assistant Professor, equally commensurate with my academic background, responsibilities and experience of 23 years in 2005 .Between 2005 and 2013,was equally denied Faculty Retirement benefits. Justice was done in 2013 when I got adequately regularized a faculty by incoming Chairman, Prof. Peiper. Shortly after, as soon as I got recommended to be promoted a Clinical Assistant Professors ,this immediately got scuttled and inappropriately delayed, Prof. Schmidt and Dr. Spudich. Divisional Chiefs submitting a prejudicial and misleading 2015/16 1st year Medical students evaluation, transforming			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT _____ SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
I declare under penalty of perjury that the above is true and correct. Digitally Signed By: Dr. OLUTAYO ARIYO 04/10/2023 <i>Charging Party Signature</i>			

EEOC Form 5 (11/09)

<p align="center">CHARGE OF DISCRIMINATION</p> <p>This form is affected by the Privacy Act of 1974 See enclosed Privacy Act</p> <p>Statement and other information before completing this form</p>	<p>Charge Presented To: Agency(ies) Charge No(s):</p> <p>EEOC 530-2023-04067</p> <p>FEPA</p>
<p>Pennsylvania Human Relations Commission and EEOC</p> <p><i>State or local Agency, if any</i></p>	

a transition from an Instructor to the Clinical Assistant Professor usually achievable in 1 year to a 5 years delay , with attendant collateral damages of 4 -Year TIMELINE loss (equivalent to the TIME-IN -RANK between the Clinical Assistant and Clinical Associate Professor) , loss of \$30000/year differential pay between an Assistant and Associate Professor were my promotional not scuttled. Year 2020, my request to be promoted to an Associate Professor by TJU was denied, despite with 16 peer reviewed publications surpassing the 10 required minimum, while a colleague hired after me with fewer peer-reviewed publications got promoted an Associate Professor as far back as 2018/19 or thereabout. On 6/21/2022 ,at a Zoom meeting with Vice-Provost, my request to be promoted a Full Professor was again denied by TJU , despite having met the required minimum 20 Peer reviewed Publications and in addition extensive Local , National and International recognitions, excellent evaluations from 1st Year Medical, Physician Assistant (PA) , Final Year Medical Students as well as Resident Doctors, extensive Scientific Meetings invitations, attendances and multiple Platform Presentations across 4 continents, served a Faculty Advisor and the one to go to on Diversity Issues relating to meeting or invited to address Minority Groups seeking opportunities in Biomedical Education as well as Medical Doctors taking a second look in Residency at Thomas Jefferson University .In 2021, I was prestigiously honored and invited by American Association of Clinical Anatomists (AACA) to impactful positions to help in Review Abstracts for National Meeting and serving a Judge. Regardless, the Vice Provost denied my request and instead gave me the option of being promoted to Associate Professor, and I accepted. On 6/24/2022 I requested the agreed promotion be backdated as at when due and I receive the backpay for that period. Again, this was denied by TJU, and I was sent promotion paperwork that was contingent on me giving up my right to sue for the backpay. TJU asserting that backdating any promotion is not appropriate nor acceptable and, in an effort, to be completely clear, we will not agree to provide any additional compensation, as we believe you have been compensated fairly and equitably throughout your Jefferson employment.

III. Retiring on June 30th, 2022, I believe I have been discriminated against by Thomas Jefferson University, due to my race (was replaced from teaching assigned 1st 2 lectures as a son to a TRUSTEE lamented why their first 2 lectures were taught by a BLACK), national origin and possible discrimination against my MBBS diploma earned from the University of Ibadan Nigeria but was not accorded same equivalency to the MD counterparts , as my other colleagues hired after me were NON-BLACK, but were with higher hiring rank and pay levels, despite the fact that I even did more exclusively directing Final Year Advanced Anat.404 and Surgical Anatomy in Head and Neck to Resident Doctors in ENT, Maxillofacial, Dermatology and Otolaryngology in violation of Title VII of the 1964 Civil Rights Act, as amended, in that Thomas Jefferson University did not only delay or denied my earlier promotions, but in addition as at 6/30/ 2022 failed to promote me to full Professor. Despite the many challenges of mis-designation, lack of respect, humiliation and the apartheid faculty responsibilities assignments aimed at disenfranchising that I experienced, that status of a Full Professor I strongly believe had been meritoriously earned and deserving.

<p>I want this charge filed with both the EEOC and the State or local Agency, if any I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures</p>	<p>NOTARY – <i>When necessary for State and Local Agency Requirements</i></p>
<p>I declare under penalty of perjury that the above is true and correct.</p> <p>Digitally Signed By: Dr. OLUTAYO ARIYO</p> <p>04/10/2023</p> <p align="right"><i>Charging Party Signature</i></p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT</p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)</p>

CP Enclosure with EEOC Form 5 (11/09)

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Philadelphia District Office
801 Market Street, Suite 1000
Philadelphia, PA 19107-3126
Email: PDOcontact@eeoc.gov
Website: eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161 & 161-A)

To: Dr. OLUTAYO ARIYO
1016 YEADON AVENUE
YEADON, PA 19050

Re: Dr. OLUTAYO ARIYO v. THOMAS JEFFERSON UNIVERSITY
EEOC Charge Number: 530-2023-04067

EEOC Representative and phone: Philadelphia Legal Unit, (267) 589-9707

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

Please retain this notice for your records.

On Behalf of the Commission:

Digitally Signed By: Karen McDonough
Wed Apr 26 00:00:00 EDT 2023

Karen McDonough
Deputy District Director

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

(This information relates to filing suit in Federal or State court under Federal law. If you also plan to sue claiming violations of State law, please be aware that time limits may be shorter and other provisions of State law may be different than those described below.)

IMPORTANT TIME LIMITS – 90 DAYS TO FILE A LAWSUIT

If you choose to file a lawsuit against the respondent(s) named in the charge of discrimination, you must file a complaint in court **within 90 days of the date you receive this Notice**. Receipt generally means the date when you (or your representative) opened this email or mail. You should **keep a record of the date you received this notice**. Once this 90-day period has passed, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and the record of your receiving it (email or envelope).

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Filing this Notice is not enough. For more information about filing a lawsuit, go to <https://www.eeoc.gov/employees/lawsuit.cfm>.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred more than 2 years (3 years) before you file suit may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit before 7/1/10 – not 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION

For information about locating an attorney to represent you, go to:
<https://www.eeoc.gov/employees/lawsuit.cfm>.

In very limited circumstances, a U.S. District Court may appoint an attorney to represent individuals who demonstrate that they are financially unable to afford an attorney.

HOW TO REQUEST YOUR CHARGE FILE AND 90-DAY TIME LIMIT FOR REQUESTS

There are two ways to request a charge file: 1) a FOIA Request or 2) a Section 83 request. You may request your charge file under either or both procedures. EEOC can generally respond to Section 83 requests more promptly than FOIA requests.

Since a lawsuit must be filed within 90 days of this notice, please submit your request for the charge file promptly to allow sufficient time for EEOC to respond and for your review. Submit a signed written request stating it is a “FOIA Request” or a “Section 83 Request” for Charge Number 530-2023-04067 to the District Director at Jamie Williamson, 801 Market St Suite 1000, Philadelphia, PA 19107. You can also make a FOIA request online at <https://eeoc.arkcase.com/foia/portal/login> or PHILFOIA@eeoc.gov.

You may request the charge file up to 90 days after receiving this Notice of Right to Sue. After the 90 days have passed, you may request the charge file only if you have filed a lawsuit in court and provide a copy of the court complaint to EEOC.

For more information on submitting FOIA Requests and Section 83 Requests, go to: <https://www.eeoc.gov/eeoc/foia/index.cfm>.



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Philadelphia District Office**

801 Market Street, Suite 1000
Philadelphia, PA 19107-3126
Free: (833) 827-2920
ASL: (844) 234-5122
FAX: (215) 440-2610
Website: www.eeoc.gov

10/31/2023

VIA: kjung@malamutlaw.com
Kurt Jung
malamutlaw
457 Haddonfield Road
Cherry Hill, NJ 08002

Re: FOIA No.: 530-2024-000571
Olutayo Ariyo v Thomas Jefferson University 530-2023-04067

Dear Esquire Jung:

Your Freedom of Information Act (FOIA) request, received on 10/12/2023, is processed. Our search began on 10/12/2023. All agency records in creation as of 10/12/2023 are within the scope of EEOC's search for responsive records. The paragraph(s) checked below apply.

Your request is granted in part and denied in part. Portions not released are withheld pursuant to the subsections of the FOIA indicated at the end of this letter.

The disclosed records are enclosed. Photocopying and search fees have been waived pursuant to 29 C.F.R. § 1610.14.

I trust that the furnished information fully satisfies your request. If you need any further assistance or would like to discuss any aspect of your request, please do not hesitate to contact the FOIA Professional who processed your request or our FOIA Public Liaison (see contact information in above letterhead or under signature line).

You may contact the EEOC FOIA Public Liaison Michael L. Heise for further assistance or to discuss any aspect of your request. In addition, you may contact the Office of Government Information Services (OGIS) to inquire about the FOIA mediation services they offer.

The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, email at ogis@nara.gov; telephone at (202) 741-5770; toll free 1-877-684-6448.

The contact information for the FOIA Public Liaison is as follows: Michael L. Heise, EEOC FOIA Public Liaison, Office of Legal Counsel, FOIA Division, Equal Employment Opportunity Commission, 131 M. Street, N.E., Fifth Floor, Washington, D.C. 20507, email to FOIA@eeoc.gov, telephone at (202) 921-2542; or fax at (202) 827-7545.

If you are not satisfied with the response to this request, you may administratively appeal in writing. Your appeal must be postmarked or electronically transmitted in 90 days from receipt of this letter to the Office of Legal Counsel, FOIA Division, Equal Employment Opportunity Commission, 131 M Street, NE, 5NW02E, Washington, D.C. 20507, email to FOIA@eeoc.gov; online at <https://eeoc.arkcase.com/foia/portal/login>, or fax at (202) 827-7545. Your appeal will be governed by 29 C.F.R. § 1610.11.

00334

530-2024-000571

See the comments below.

Sincerely,

Jamie R. Williamson
District Director
philfoia@eeoc.gov



Fredricka B. Warren
Government Information Specialist
miamfoia@eeoc.gov

Send your request to <https://eeoc.arkcase.com/foia/portal/login>

Send an email via support@arkcase.com if you have arkcase issues.

Applicable Sections of the Freedom of Information Act, 5 U.S.C. § 552(b):

Exemption(s) Used:

<input type="checkbox"/> (b)(3)(A)(i)	<input type="checkbox"/> (b)(6)
<input type="checkbox"/> § 706(b)	<input type="checkbox"/> (b)(7)(A)
<input type="checkbox"/> § 709(e)	<input type="checkbox"/> (b)(7)(C)
<input type="checkbox"/> § 107 of the ADA	<input type="checkbox"/> (b)(7)(D)
<input type="checkbox"/> § 207 of the GINA	<input type="checkbox"/> (b)(7)(E)
<input type="checkbox"/> (b)(4)	<input type="checkbox"/> (b)(7)(F)
<input type="checkbox"/> (b)(5)	

(b)(5)

Exemption (b)(5) to the Freedom of Information Act (FOIA), 5 U.S.C. § 552(b)(5) (2016), as amended by the FOIA Improvement Act of 2016, Pub. L. No. 114-185, 130 Stat. 538, permits withholding documents that reflect the analyses and recommendations of EEOC personnel generated for the purpose of advising the agency of possible action. This exemption protects the agency's deliberative process and allows nondisclosure of "inter-agency or intra-agency memorandums or letters which would not be available to a party other than an agency in litigation with the agency." 5 U.S.C. § 552(b)(5). The exemption covers internal communications that are deliberative in nature. *National Labor Relations Board v. Sears, Roebuck & Co.*, 421 U.S. 132 (1975); *Hinckley v. United States*, 140 F.3d 277 (D.C. Cir. 1998); *Mace v. EEOC*, 37 F. Supp. 2d 1144 (E.D. Mo. 1999). The purpose of the deliberative process privilege is to "allow agencies freely to explore alternative avenues of action and to engage in internal debates without fear of public scrutiny." *Missouri ex. rel. Shorr v. United States Corps of Eng'rs.*, 147 F.3d 708, 710 (8th Cir. 1998). Disclosure of preliminary assessments and opinions would create a chilling effect on the Commission staff's ability to freely and openly deliberate and discuss ideas, strategies, and recommendations, thereby impairing the Commission's ability to effectively and efficiently enforce applicable federal EEO laws by investigating charges and complaints, litigating and adjudicating cases, promulgating regulatory and sub-regulatory guidance, conducting outreach and education activities, and other related activities. Records may

530-2024-000571

be withheld under this exemption if they were prepared prior to an agency's decision, *Wolfe v. Dep't of Health and Human Services*, 839 F.2d 768, 775, 776 (D.C. Cir. 1988) (en banc) and for the purpose of assisting the agency decision maker. *First Eastern Corp. v. Mainwaring*, 21 F.3d 465, 468 (D.C. Cir. 1994). See also, *Greyson v. McKenna & Cuneo* and *EEOC*, 879 F. Supp. 1065, 1068, 1069 (D. Colo. 1995). Records may also be withheld to the extent they reflect "selective facts" compiled by the agency to assist in the decision-making process. *A. Michael's Piano, Inc. v. Federal Trade Commission*, 18 F.3d 138 (2d Cir. 1994). An agency may also withhold records to the extent that they contain factual information already obtained by a requester through prior disclosure. See *Mapother, Nevas, et al. v. Dep't of Justice*, 3 F.3d 1533 (D.C. Cir. 1993). DOCUMENTS WITHHELD PURSUANT TO EXEMPTION (b)(5) TO THE FOIA:

DOCUMENTS WITHHELD PURSUANT TO EXEMPTION (b)(5) TO THE FOIA	
Page	Description
7-10	Exemption 552 (b) (5): Intra-agency correspondence, redacted Activity Log/Case Log/Routing Sheet containing the Investigator's pre-decisional thoughts (redact)

(b)(7)(C)

Exemption (b)(7)(C) to the Freedom of Information Act (FOIA), 5 U.S.C. § 552(b)(7)(C) (2016), as amended by the FOIA Improvement Act of 2016, Pub. L. No. 114-185, 130 Stat. 538, authorizes the Commission to withhold:\n\nrecords or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information . . . (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy\n\nThe seventh exemption applies to civil and criminal investigations conducted by regulatory agencies. *Abraham & Rose, P.L.C. v. United States*, 138 F.3d 1075, 1083 (6th Cir. 1998). Release of statements and identities of witnesses and subjects of an investigation creates the potential for witness intimidation that could deter their cooperation. *National Labor Relations Board v. Robbins Tire and Rubber Co.*, 437 U.S. 214, 239 (1978); *Manna v. United States Dep't. of Justice*, 51 F.3d 1158, 1164 (3d Cir. 1995). Disclosure of identities of employee-witnesses could cause "problems at their jobs and with their livelihoods." *L&C Marine Transport, Ltd. v. United States*, 740 F.2d 919, 923 (11th Cir. 1984).\n\nThe Supreme Court has explained that only "[o]fficial information that sheds light on an agency's performance of its statutory duties" merits disclosure under FOIA, and noted that "disclosure of information about private citizens that is accumulated in various governmental files" would "reveal little or nothing about an agency's own conduct." *United States Dep't of Justice v. Reporters Comm. for Freedom of the Press*, 489 U.S. 749, 773 (1989).\n\nFor the purposes of determining what constitutes an unwarranted invasion of personal privacy under exemption (b)(7)(C), the term "personal privacy" only encompasses individuals, and does not extend to the privacy interests of corporations. *FCC v. AT&T Inc.*, 131 S.Ct. 1177, 1178 (2011).

DOCUMENTS WITHHELD PURSUANT TO EXEMPTION (b)(7)(C):	
Page	Description
19	Exemption 552 (b) (7) (C) : Intra-agency correspondence, redacted Digital Charge System (redact Password)

530-2024-000571

For a full description of the exemption codes used please find them at the following URL:
<https://www.eeoc.gov/foia/freedom-information-act-reference-guide>

This response was prepared by Fredricka Warren, Government Information Specialist, who may be reached at miamfoia@eeoc.gov.

EXHIBIT 37

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

OLUTAYO ARIYO	:	
Plaintiff	:	CIVIL ACTION
	:	No. 2:23-cv-02835-NIQA
v.	:	
	:	PLAINTIFF REQUESTS A
THOMAS JEFFERSON UNIVERSITY	:	TRIAL BY JURY
MEDICAL COLLEGE	:	
Defendants	:	

PLAINTIFF’S FIRST AMENDED COMPLAINT

I. PRELIMINARY STATEMENT

1. This is an action for an award of damages, declaratory and injunctive relief, attorneys’ fees and other relief on behalf of Plaintiff, OLUTAYO ARIYO. Plaintiff was an employee of Defendants, THOMAS JEFFERSON UNIVERSITY MEDICAL COLLEGE, (“Jefferson”), who has been harmed by the Defendants’ discriminatory employment practices.

2. This action arises under Title VII of the Civil Rights Act of 1964, as amended, (“Title VII”), 42 U.S.C. §2000e-2(a)(1), the Pennsylvania Human Relations Act, 43 P.S. § 952(b), and the Civil Rights Act of 1866, 42 U.S.C. §1981 (“42 U.S.C. §1981”).

II. PARTIES

3. Olutayo Ariyo (hereinafter “Plaintiff”) is an adult individual and a citizen of the Commonwealth of Pennsylvania, residing in Yeadon Pennsylvania.

4. Plaintiff is an African American male and immigrant to the United States, and thus is in a protected class due to his race (Black) and national origin (Nigerian).

5. Thomas Jefferson University Medical College (hereinafter “Defendant”) is a legal entity that is operating in Philadelphia, Pennsylvania.

6. ABC Corporations 1-10 are corporations not yet known who have ownership and/or control over Defendant, and who acted as Plaintiff's employer.

7. At all times material and relevant to this complaint, defendant was acting by and through its agents, servants, workmen, employees and/or representative who were acting within the course and scope of their employment and/or agency with said defendant. The conduct, action and/or omissions of the agents, servants, workmen, employees and/or representatives of defendant is imputed to defendant and defendant is fully liable for the conduct, action and/or omissions for its agents, servants, workmen, employees and/or representatives.

III. JURISDICTION AND VENUE

8. Subject matter jurisdiction is appropriate in this Court because this Court has federal question jurisdiction over Plaintiff's Title VII and 42 U.S.C. § 1981 claims. Personal jurisdiction is appropriate because the Court has general jurisdiction over the Defendant and specific jurisdiction over matters arising out of Plaintiff's employment. Additionally, Plaintiff has fulfilled all administrative requirements for his claim under Title VII of the Civil Rights Act and the Pennsylvania Human Relation Act.

9. Venue is appropriate for this action because this is the vicinage where the events underlying this matter took place.

IV. UNDERLYING FACTS

10. In 1995, Defendant hired Plaintiff as a part-time post-Doc fellow.

11. In 2005, Defendant hired Plaintiff as a Research Associate while awaiting a recommendation for a full-time permanent faculty position as an Assistant Professor. During his employment with the Defendant, Plaintiff was subjected to discrimination based on his race and national origin.

12. Between 2005 and 2013, Defendant assigned Plaintiff responsibilities as an Assistant Professor, but paid him as a Research Associate. Specifically, Defendant refused to promote Plaintiff, and held him below his credential, without the appropriate title, salary, and benefits that came with his qualifications and his responsibilities.

13. In 2013, Stephen Peiper, Chairman of the Department of Pathology, Anatomy, and Cell Biology, recommended that Plaintiff be promoted to a Clinical Assistant Professor position. However, despite his recommendation, Defendant denied Plaintiff a promotion.

14. In 2015 and 2016 Richard Schmidt and Elizabeth Spudich, Division Chiefs, sought to sabotage Plaintiff's promotion by submitting false and misleading first year medical student evaluations.

15. In 2020, Defendant denied Plaintiff's request to be promoted to Assistant Professor, while it promoted other similarly-situated non-Black and non-Nigerians who had less qualifications than Plaintiff did to the position.

16. On June 21, 2022, Defendant denied Plaintiff's request to be promoted to Full Professor but offered Plaintiff a position as Assistant Professor.

17. On June 24, 2022, Plaintiff requested that the promotion be back dated and provide backpay.

18. On June 24, 2022, Defendant offered Plaintiff the Assistant Professor position contingent on him waiving his right to sue for back pay. Other similarly situated non-Black and non-Nigerian Assistant Professors were not required to waive any rights.

19. On June 30, 2022, Plaintiff retired and was thus constructively discharged and resigned from employment.

20. After several years of pushing to be treated fairly it became clear that Plaintiff's Department, which never had any Black or Nigerian professors, was never going to treat Plaintiff fairly. Plaintiff's constructive discharge came at the end of a campaign of discrimination and failure to promote Plaintiff to a fair and equitable position due to his race and national origin, in violation of Title VII of the Civil Rights Act and 42 U.S.C. § 1981.

COUNT ONE
Racial and National Origin Discrimination Under 42 U.S.C. § 1981

21. Plaintiff, Olutayo Ariyo, incorporates herein, by reference thereto, paragraphs one through 18 inclusive, as though the same were set forth herein at length.

22. Plaintiff was in a protected class due to his race and national origin.

23. From the time he started working for the Defendant, Plaintiff was performing all the duties as a full Professor, but did was not given the title, benefits and pay.

24. Defendant treated other similarly situated non-Black and non-Nigerian employees more favorably and not passed over for promotions and provided with the title, benefits, and pay. Plaintiff suffered from racial and national origin discrimination that included being passed over for a promotion due to his protected classes.

25. Eventually, when it became apparent that Plaintiff would never be treated fairly, he was constructively discharged and forced to retire from employment.

26. First, Plaintiff was subject to a campaign of discrimination because of his race and national origin, in violation of 42 U.S.C. §1981.

27. Second, Plaintiff was constructively discharged in violation of 42 U.S.C. § 1981.

WHEREFORE, Plaintiff respectfully requests compensatory damages against Defendant and ABC Companies 1-10 in excess of \$75,000, together with punitive damages, as well as costs, interest, and other relief the Court may deem appropriate under the circumstances.

COUNT TWO

Racial and National Origin Discrimination Under Title VII of the Civil Rights Act

28. Plaintiff, incorporates herein, by reference thereto, paragraphs one through 18 inclusive, as though the same were set forth herein at length.

29. Plaintiff was in a protected class under Title VII of the Civil Rights Act due to his race and national origin.

30. From the time he started working for the Defendant, Plaintiff was performing all the duties as a full Professor, but did was not given the title, benefits and pay.

31. Defendant treated other similarly situated non-Black and non-Nigerian employees more favorably and not passed over for promotions and provided with the title, benefits, and pay. Plaintiff suffered from racial and national origin discrimination that included being passed over for a promotion due to his protected classes.

32. Eventually, when it became apparent that Plaintiff would never be treated fairly, he was constructively discharged and forced to retire from employment.

33. First, Plaintiff was subject to a campaign of discrimination because of his race and national origin, in violation of Title VII of the Civil Rights Act of 1964, as amended.

34. Second, Plaintiff was constructively discharged in violation of Title VII of the Civil Rights Act of 1964, as amended.

WHEREFORE, Plaintiff respectfully requests appropriate backpay, front pay, and compensatory damages against Defendant and ABC Companies 1-10 in excess of \$75,000, together with punitive damages, as well as costs, interest, and other relief the Court may deem appropriate under the circumstances.

JURY DEMAND

Plaintiff demands a trial by jury.

MALAMUT & ASSOCIATES, LLC

/s/ Mark R. Natale

Mark R. Natale, Esquire – PA ID 316939

Attorneys for Plaintiff

457 Haddonfield Road, Suite 500

Cherry Hill, NJ 08002

856-424-1808

856-295-4888 (f)

mnatale@malamutlaw.com

EXHIBIT 38

Olutayo Ariyo, MBBS
Promotion

GUIDELINES FOR RANKS IN CLINICIAN EDUCATOR TRACK

CLINICAL ASSISTANT PROFESSOR Primary: Pathology, Anatomy, and Cell Biology

Credentials	Appropriate terminal degree for appointment (MD degree or equivalent)
	Evidence of appropriate current credentials for position (board certification and recertification as appropriate)
Education	Current role (>20 hrs/year) in education of TJU students or other trainees
	Educational portfolio demonstrating proficiency in teaching
	Evidence of attainment of pedagogical training (10 hours or more)
Clinical Service	Clinical Excellence as demonstrated by reputation among peers and patient outcomes
Leadership	
Service to University	
Letters of Recommendation	Two letters of recommendation from faculty at Associate Professor level or higher attesting to professionalism, clinical excellence, commitment and effectiveness as a teacher

Packet Notes

Olutayo Arriyo, MBBS

Promotion to Clinical Assistant Professor

Pathology, Anatomy, and Cell Biology

-Evidence of teaching Effectiveness in letter of recommendation from Dr. Eisenman.

NOMINATION FOR APPOINTMENT / PROMOTION

Date :

☐ Appointment ☒ Promotion

Applicant Name: Olutayo Ariyo
 Address: 1016 Yeadon Avenue
 Yeadon, PA 19050

Primary
 Nomination by: Stephen C. Peiper, M.D.
 Department Chairperson

Pathology, Anatomy and Cell Biology
 Department Division (if applicable)

For Dual Appointment With: _____
 Department Division (if applicable)

Effective Date: _____

Status: ☒ Fully Salaried ☐ Partly Salaried ☐ Non-Salaried
☒ Full Time ☐ Part Time ☐ Volunteer
☐ Clinical and Educational ☒ Clinician Educator ☐ Non-Tenure Research ☐ Tenure Eligible Academic
 Scholarship Track Track Track Investigator Track
☒ JMC/TJU ☐ Affiliate _____

Proposed Rank: ☐ Instructor ☒ Assistant Professor ☐ Associate Professor ☐ Professor

Describe Reason for Appointment / Promotion requested:

Applying for Medical Staff Privileges (Appointments Only): TJUH Center City Methodist Division
☐ Yes ☐ No ☐ Yes ☐ No

Completed by: Sharonlee HughesPhone: 5-5057

Chairman: _____

Signature

For: ☒ Primary Department

Chairman: _____

Signature

For: ☐ Secondary DepartmentGuidelines for Tracks and Professional Ranks can be found at: www.jefferson.edu/jmc/faculty/appts.cfm**For official use only. Do not write below this line.**

Action Committee on Faculty Appointments and Promotions

☐ Approve ☐ Appointment to: _____ Date: _____
☐ Promotion to: _____
☐ Change of Status to: _____

☐ Defer (explain): _____ Date: _____

☐ Defer (explain): _____ Date: _____

☐ Reject: _____ Date: _____

Executive Council _____ Date: _____

SAAC / Board of Trustees _____ Date: _____

Rev. Aug-2008



**Sidney Kimmel
Medical College**
at Thomas Jefferson University

Stephen C. Pelper, MD
Peter A. Herbut Professor and Chair
Department of Pathology, Anatomy,
and Cell Biology
Senior Vice President
Enterprise Pathology & Laboratory
Services

1020 Locust Street, Suite 279
Philadelphia, PA 19107
T 215-955-5060
F 215-955-5058
stephen.pelper@jefferson.edu

April 9, 2018

Mark L. Tykocinski, MD
Provost and Executive Vice President for Academic Affairs
Thomas Jefferson University
The Anthony F. and Gertrude M. DePalma Professor & Dean
Sidney Kimmel Medical College at Thomas Jefferson University
Philadelphia, PA 19107

RE: Promotion of Dr Olutayo Ariyo to Assistant Professor in the Clinician Educator Track

Dear Dean Tykocinski:

I am writing in support of the promotion of Dr Olutayo Ariyo to Assistant Professor in the Clinician Educator Track.

OVERVIEW

Dr Ariyo is a member of the academic team that teaches gross and microscopic anatomy to medical students in the Sidney Kimmel Medical College, as well as in other curricula in the School of Health Professions. Educators with this specialty are a vanishing breed. Dr Ariyo has demonstrated a high degree of loyalty to Jefferson students and to the Department of Pathology, Anatomy & Cell Biology. His participation as an educator demonstrates an institutional commitment to pedagogy and diversity.

Dr Ariyo has credentials *appropriate to the position* of Clinical Assistant Professor. He received the MBBS degree from the University of Ibadan, Nigeria, in 1980. After his internship (Medicine, Surgery, Pediatrics, and Obstetrics and Gynecology) at Obafemi Awolowo University Teaching Hospital, he served as a Lecturer II in Anatomy and Embryology at this institution (1982 - 1986). He then worked as a postdoctoral fellow in Developmental Embryology at the University of Pennsylvania from 1986 to 1991.

Dr Ariyo has significant *achievements in education*. He taught human anatomy to first year medical students at the University of Pennsylvania during his postdoctoral fellowship in Anatomy/Embryology at the University of Pennsylvania (1986 to 1991). He has taught human gross and microscopic anatomy at Jefferson since 1993. He taught anatomy, histology, and neuroanatomy to Jefferson medical students from 2005 to 2013. He taught Human Form and Development, Microscopic Anatomy, and Neuroanatomy to first year students in Jefferson/Sidney Kimmel Medical College since 2013, as well as Human Form and Development to students in the Physical Therapy and Physician's Assistant Programs at Jefferson and Arcadia University. He has taught anatomy of the human head and neck to residents in Otolaryngology and Dermatology since 2013. He has served as an anatomy advisor/mentor to students in the Medical College since 2013 and to students in the Physical Therapy Curriculum since 2016. He developed and implemented a Clinical Perspectives in the Human Form and Development course which utilized his clinical background to enhance the meaningfulness of this course.

Dr Ariyo is an educator and, therefore, does not have *achievements in clinical care*.

Dr Ariyo does have *achievements in research and scholarship*. His *curriculum vitae* lists five published manuscripts, four of which he has first authorship. These manuscripts describe the observation of anatomical anomalies discovered during cadaver dissection. He has twelve anatomy education abstracts, which have been presented at national and international meetings of the Association for Clinical Anatomy, including the European, American, and British sections of the society.

Mark L. Tykocinski, MD
April 9, 2018
Page 2 of 2

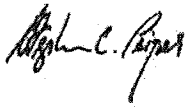
Dr Ariyo has developed *evidence of a significant reputation outside of Jefferson*. He has served as a judge for the selection of poster presentations for the American Association of Anatomists since 2014. He is a member of the editorial board of the Journal of Orthopedics. He has made invited presentations at the national meeting of the Association of Clinical Anatomists and the British Association of Clinical Anatomy.

Dr Ariyo has *served the University* through his participation in the Diversity Group of Thomas Jefferson University since 2014.

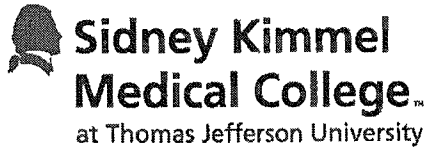
Dr Ariyo's *career development will be mentored* by Dr J. Raymond Shea. They will meet weekly to review Dr Ariyo's progress in educational activities, scholarly efforts, and to further hone his expertise in human anatomy.

It is clear that Dr Ariyo has met the criteria for promotion from Clinical Instructor to Clinical Assistant Professor. He makes very positive contributions to his field, both at Jefferson and outside, and is highly loyal to the institution. Thank you for your consideration of this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen C. Peiper". The signature is fluid and cursive, with the first name "Stephen" and last name "Peiper" clearly distinguishable.

Stephen C. Peiper, MD



Department of Pathology, Anatomy
& Cell Biology
(Anatomy)

Mark Tykocinski, MD
Provost and Executive Vice President for Academic Affairs
Thomas Jefferson University
The Anthony F. Gertrude M. DePalma Dean
Sidney Kimmel Medical College at Thomas Jefferson University
1025 Walnut Street
Suite G-4, College Building
Philadelphia, PA 19107

Re: **Olutayo G. Ariyo, MBBS, MBA**
Letter of support for faculty rank promotion to Clinical Assistant Professor

This letter is to support the promotion of Olutayo G. Ariyo, MBBS, MBA to the faculty rank of Clinical Assistant Professor.

In my associations with Dr. Ariyo in the anatomy lab I have found him to be competent in the subject manner and his ability to mentor students in this experiential learning environment. He consistently demonstrates integrity in his interactions with students and faculty.

Dr. Ariyo has met the criteria for Clinical Assistant Professor in the Clinician Educator Track in the following ways:

- **Credentials**
 - He earned a MBBS (equivalent to an MD degree) in Nigeria (1980)
 - Member, Nigerian Medical Council since 1981
- **Education**
 - Currently a full-time faculty member in the Anatomy Division of the Department of Pathology, Anatomy, and Cell Biology. He team teaches in the anatomy, histology, and neuroscience sections of the medical curriculum (June 2013 – present)
 - He receives favorable feedback from students on his classroom performance
 - He completed part-time assisting in the dissection portion of the Human Form and Development course as a Post-Doc from 1995-2005 and he regularly meets with J. Raymond Shea Jr. PhD, FAS to collaborate on scholarship regarding anatomical anomalies
- **Clinical Service**
 - Dr. Ariyo is not a practicing clinician, so I will address his clinical training he provides in the dissection labs. Dr. Ariyo is very popular with our students in the

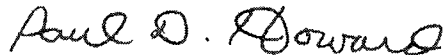
labs. He is excellent at tying in the clinical relevance as students complete their dissections. He is frequently seen with small groups around him in the labs as he discusses various anomalies and pathologies that they will encounter in clinical practice. Students appreciate this instruction and appear to benefit from the information.

- Leadership
 - Dr. Ariyo mentors medical students assigned to him each year. Students appear to benefit from discussions with him and from the guidance he provides.
- Service to the University
 - Dr. Ariyo regularly attends and contributes to the meetings held by the Office of Diversity. He also participates in anatomy programs targeted at high school students who are considering a career in the health professions.
- Scholarship
 - In the past 5 years Dr. Ariyo was an author on 4 peer-reviewed articles. The articles presented and discussed anatomical variants. He also had 11 medical education abstracts that were presented in the past 5 years.

Dr. Ariyo meets the criteria for the proposed track and rank.

I support the promotion of Olutayo G. Ariyo, MBBS, MBA to the rank of Clinical Assistant Professor in the Clinical Educator track.

Sincerely yours,



Paul D. Howard, DPT, PhD
Clinical Professor
Department of Pathology, Anatomy, and Cell Biology
Sidney Kimmel Medical College
Thomas Jefferson University



**Sidney Kimmel
Medical College**
at Thomas Jefferson University

Department of Pathology, Anatomy
& Cell Biology

March 15, 2016

Mark L. Tykocinski, MD
Provost and Executive Vice President for Academic Affairs
Thomas Jefferson University
The Anthony F. and Gertrude M. DePalma Professor & Dean
Sidney Kimmel Medical College at Thomas Jefferson University
Philadelphia, PA 19107

Re: Olutayo Ariyo, MBBS, MBA. - Promotion as Clinical Assistant Professor in the Clinician Educator Track

Dear Dean Tykocinski;

I am pleased to write to you regarding the proposed faculty appointment of Dr. Olutayo Ariyo as Assistant Professor in the Department of Pathology, Anatomy and Cell Biology. I have had an opportunity to interact with Dr. Ariyo as a colleague over the past few years and have discussed his approach to teaching and the study of clinically relevant anatomic variants on many occasions

Dr. Ariyo had his basic medical education at the prestigious University of Ibadan, Ibadan, Nigeria and received his MBBS (M.D. equivalent degree) in 1974. While pursuing his post-graduate training, he served as a lecturer in the Department of Anatomy Obafemi Awolowo University Ile-Ife, Nigeria. Shortly afterward he emigrated to the USA to pursue his research interests as a graduate student in the department of Anatomy of the University of Pennsylvania. He subsequently received an MBA from Temple University in 2002.

Since 2013 he has served as a Clinical Instructor, in the division of Anatomy in the department of Pathology. Dr. Ariyo is a dedicated and very able educator. He both lectures and works at the bench with small groups of students in the Jefferson gross anatomy course. He teaches anatomy in the physician assistant and physical therapy programs in the TJU Allied Health programs as well as the School of Nursing. He serves as an instructor in several additional programs including residents of the department of Otolaryngology-Head and Neck Surgery. He also teaches human anatomy for physical therapy and physician assistant students of Arcadia University,

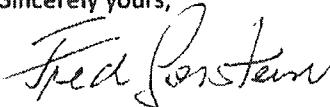
Dr. Ariyo has a particular interest in identifying anatomical variants and their clinical implications. His work has contributed to a better understanding of the clinical importance of anatomic variation in a variety of location. Examples of these studies include the identification of a high arising hypoplastic and superficial brachioradial artery that can be easily mistaken for a vein with the resulting inadvertent arterial drug injection and consequent arterial obstruction, vascular spasm, ischemia and limb loss.

In other studies he identified a persistent median artery (PMA) often associated with a bifid median nerve producing compression and carpal tunnel syndrome (CTS); the origin of a retro-esophageal right subclavian artery as a factor in dysphagia, as well as hypoplastic, aberrant and abnormally tortuous vascular variants in many other locations with significant clinical implications. He demonstrated how the varying anatomic locations of the appendix contribute to differences in the clinical presentation of acute appendicitis.

Dr. Ariyo's work has been published in a number of peer reviewed journals, presented at international meetings of the European Association of Clinical Anatomy, the British Association of Clinical Anatomy and the American Association of Clinical Anatomy.

I have no reservation in recommending Dr. Olutayo Ariyo, by virtue of his excellent contributions as an educator and his correlative clinical research studies, as very worthy of consideration for an appointment as Clinical Assistant Professor in the Clinician Educator Track in the Department of Pathology, Anatomy and Cell Biology.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Fred Gorstein".

Fred Gorstein, MD
Professor and Chair, Emeritus
Department of Pathology, Anatomy and Cell Biology
Thomas Jefferson University Medical Center
Sidney Kimmel College of Medicine
Philadelphia, PA 19107



**Sidney Kimmel
Medical College**
February 1, 2016
at Thomas Jefferson University

Department of Pathology, Anatomy
& Cell Biology

Mark Tykocinski, M.D.
Provost and Executive Vice President for Academic Affairs
The Anthony and Gertrude M. DePalma Dean
Sidney Kimmel Medical College at Thomas Jefferson University
Scott Building, 6th Floor
Philadelphia, PA 19107

Dear Dr. Tykocinski:

I am writing to you in support of the appointment of Olutayo G. Ariyo, MBBS, MBA, at the rank of Clinical Assistant Professor in the Clinical Educator tract in the Sidney Kimmel Medical College.

I have known, and taught with, Dr. Ariyo for more than ten years in the Anatomy Division of the Department of Pathology, Anatomy and Cell Biology. He is a very fine instructor, especially in the laboratory setting. His lectures, many of which I have personally attended, are quite good. They cover the requisite material and he complements the basic human anatomy with numerous clinical correlations, which demonstrate the relevance of the basic material he is teaching. Admittedly he sometimes does not receive favorable evaluations from some students, but this is primarily due to his Nigerian accent. Nonetheless, his lectures are competent, informative, well paced and cover the requisite material.

In the laboratory setting, where he can discuss the dissections on a more intimate basis with a few students, he is able to demonstrate his vast knowledge of Human Anatomy. He gives thorough pre-lab sessions, which review the material for that day's dissection. It is in this dissection setting that he is able to relate to the students and his accent is no longer an issue. In this setting he develops a good rapport with the students. He often does very thorough dissections as he has a keen interest in anatomical variations, material about which he has used for a number of abstracts and publications.

He attends professional meetings when he is able and has presented his work on anatomical variations at a number of these national and international scientific meetings. This has resulted in six abstracts and 4 papers in peer reviewed journals. He is definitely using his anatomical proficiency to expand the knowledge base concerning anatomical variation in the human.

Because of his current rank of Clinical Instructor, he is not eligible for membership on most College or University committees.

I urge you to support his application for Clinical Assistant Professor in the Clinical Educator tract, in the Sidney Kimmel Medical College of Thomas Jefferson University.

Sincerely,

Leonard M. Eisenman, Ph.D.
Professor
Division of Anatomy
Department of Pathology, Anatomy, and Cell Biology
Sidney Kimmel Medical College
Thomas Jefferson University
1020 Locust Street
Philadelphia, PA 19107

CURRICULUM VITAE

Date: 3/22/2016

Olutayo G. Ariyo, MBBS. , MBA

Home Address : 1016 Yeadon Avenue
Yeadon. PA 19050

Office Address: 1020 Locust Street
263F JAH
SKMC at Thomas Jefferson University
Philadelphia. PA 19107
Olutayo.ariyo@jefferson.edu

CREDENTIALS.

1974-1980 MBBS (Equivalent to M.D. degree). University of Ibadan, Ibadan. Nigeria.

1999-2002 MBA Temple University

LICENSURE

Member, Nigerian Medical Council since July, 1981.

Member, American Association of Clinical Anatomy.

Post Graduate Training and Fellowship Appointments

1984-1986: Training Fellow, Obafemi Awolowo University, Ile-Ife. Nigeria

1986-1991 : Graduate Student, Anatomy Department, University of Pennsylvania, Philadelphia

Faculty Appointments

06/2013-present. Clinical Instructor, SKMC at Thomas Jefferson University, Philadelphia, PA. 19107

1982-1986 : Lecturer II Department of Anatomy Obafemi Awolowo University Ile-Ife , Nigeria.

Hospital and Administrative Appointments

1981-1982 : Senior Medical Officer, Staff Clinic, Obafemi Awolowo University, Ile-Ife. Nigeria

1984-1986 : Visiting Medical Officer, College of Education Staff Clinic, Ilesa-Nigeria.

EDUCATION.

1. Part Time (Post-Doc) Assisting in dissection class in Human Gross Anatomy 1995-2005 (HF&D)
2. Research Associate A . Dept. of Pathology, Anatomy and Cell Biology 2005-2013

3. Clinical Instructor in Human Gross Anatomy (HF&D) to First Year Graduate Medical Students 06/2013- present (ANAT.105.01)
4. Clinical Instructor in Advanced Human Anatomy to First year Physical Therapy students. (PT.503.01)
5. Clinical Instructor in Human Gross Anatomy. Arcadia PA students
6. Clinical Instructor in Human Gross Anatomy. Physician Assistant Students Thomas Jefferson University (2014 –present)
7. Clinical Instructor in CB.615.01 -Dev. Bio 1-
8. Participates in prosection conferences Applied Anatomy 404 (2009-present)
9. Clinical Instructor ; Head and Neck Human Gross Anatomy to ENT Residents (2013-present).

Lectures by invitation

International

June 15, 1987 Molecular changes during fertilization of the egg
Obafemi Awolowo University, Ile-Ife. Nigeria.

April 24, 2009 Variant Arterial Patterns of the Upper Limb
Obafemi Awolowo University , Ile-Ife Nigeria

Educational portfolio demonstrating proficiency in teaching.

This is contained in my submitted teaching philosophy portfolio. My core competency is in teaching clinical anatomy which receives great commendations from the students.

Directing and teaching Head and Neck to ENT Residents and excellent reviews from them confirms such competency.

Evidence of attainment of pedagogical training.

I meet regularly with my Mentor, Dr. John Shea, a minimum of 2 hours/ month, reviewing pedagogical projects that I am currently building on simple learning modules on vascular anomalies and their clinical significance with a view of building a course devoted to anatomical variants and their clinical significances. Combined with my current collections of numerous anatomical variant structures, I hope building a library on anatomical aberrant findings would be a valuable teaching resource in advanced anatomy when students have selected their specialties and need more intensive training in the basic science preparatory to their graduating as JeffMD Ambassadors.

Clinical Service- N.A

Peers in the Division of Anatomy give compliments on my knowledge of Clinical Anatomy and my Research Interest focused on Anatomical Variants and the Clinical implications

Leadership.

Yearly a mentor to about 40 assigned first year medical students on academic and professional developments.

Contacted by and wrote references on behalf of students applying for the Foederer Travel scholarship and other professional

Service to University

1. Committee membership limited by my academic status as a Clinical Instructor, but had expressed interests in serving on the Admission and New Curriculum Developing Committees.

2. Served yearly as a mentor to a group of assigned medical students (about 40 average) in HF&D,

3. Works closely with Dr. Lopez and the Office of Diversity, attending meetings regularly, contributing to debates on Jefferson commitment to achieving greater diversity

4. Volunteer in tutoring High School Students and other Health professionals who visit our dissecting facilities, giving tips especially on how to prepare themselves as future students at Jefferson and preparing projected teaching materials.

Publications : (Peer Reviewed)

1. C.L. Mills, **O. Ariyo**, K., M. Yamada, J. W. Lash , and Ruth Bellairs (1990) Evidence for the involvement of receptors for fibronectin in the promotion of chick tail segmentation. Anat Embryol) 182:425-434
2. **Ariyo O** (2015) . A Segmental Hypoplastic Anterior Tibial Artery Coexisting with an Hypertrophied Perforating Fibular Artery. A Case Report and Clinical implications. Int.J.Morphol, 33(1): 19-23.
- 3 **Ariyo O** (2015) Coupled Multiple Musculo-Neurovascular Variants in the L Upper Limb and Clinical Implications. Int. J Morphol. 33(43) :1406-1410.
- 4.**Ariyo O**, Fenderson, B. (2015). A variant of the classical superficial brachioulnoradial artery. Morphology and clinical significances. Journal Surgical and Radiologic Anatomy, (), 1-3 DOI 10.1007/s00276-015-1605-6

Medical Education Abstracts:

1. **Ariyo O** and Shea JR (2013) Axillary Artery Bifurcation Accepted and published by European Association of Clinical Anatomy (EACA) Lisbon, Portugal
2. **Ariyo O** and Shea JR (2013) Ulnar-Median Nerve Transposition Accepted and published by European Association of Clinical Anatomy (EACA), Lisbon, Portugal
3. **Ariyo O** (2014) Bilateral but Dissimilar Brachioradial Artery. Morphology and Clinical Implications. British Association of Clinical Anatomy. Plymouth.
- 4 **Ariyo O** (2015). Aberrant Right Subclavian Artery Arising distal to Left Subclavian Artery and Its Clinical Implications. American Association of Clinical Anatomy. Salt-Lake City, UTAH, Regional Conference . *
5. **Ariyo O.** (2015) Pictorial Essay on Variant Origins of the Vertebral Artery- Accepted for Oral presentation at the 2015 Winter Meeting of the British Association of Clinical Anatomy (BACA) London.**
6. **Ariyo O.** (2015). Lusoria Dysphagia and Kommerrel Syndrome Accepted for poster presentation at the 2015 Winter Meeting of the British Association of Clinical Anatomy (BACA) London.

Highlights.

- Abstract presented as a Branch Out Speaker (SLC, Utah. 10/17/2015

** Abstract designated for oral presentation at the BACA Winter Meeting (London, Dec. 10th, 2015).



Internal Communications

NAME: OLUTAYO ARIYO MBBS, MBA.

JEFFERSON TEACHING PORTFOLIO

After completion, please send electronically to SKMC.FacultyRecords@jefferson.edu

General Instructions: *All individuals applying for a SKMC faculty appointment or a promotion at the assistant professor rank or higher in the Clinician Educator track, the Clinical and Educational Scholarship track or the Academic Investigator track are required to submit a teaching portfolio along with their Curriculum Vitae. A teaching portfolio is not required for appointments or promotions in the Research track and for appointments at the Instructor rank in any track. The purpose of the Teaching Portfolio is to highlight the quality, quantity and scholarly nature of faculty's educational activities in the appointments and promotions process.*

Faculty are required to complete sections I(a), Direct Teaching Activities, and VII, Reflective Statement. Other sections should be completed to the extent there are achievements or activities in these areas.

PLEASE NOTE THAT THERE IS A MINIMUM REQUIREMENT OF 20 HOURS PER YEAR OF CONTACT WITH TJU STUDENTS OR TRAINEES IN ORDER TO BE ELIGIBLE FOR A FACULTY APPOINTMENT IN ALL BUT THE RESEARCH TRACK. THIS MINIMUM REQUIREMENT FOR TEACHING CONTACT MUST BE EVIDENT FROM THE TEACHING PORTFOLIO. (SEE NEXT PARAGRAPH)

SKMC faculty applying for a promotion should complete the portfolio for activities and achievements occurring while a SKMC faculty member. Individuals applying for an initial SKMC faculty appointment should complete the portfolio for activities and achievements related to their position(s) prior to applying for a SKMC faculty appointment. The prospective faculty member should also document that their anticipated teaching activities as a SKMC faculty member meet the 20 hour/year requirement.

I. Direct Contributions to Teaching

You may choose to include extramural teaching activities for the sections below, however this is not mandatory.

I currently teach human gross , microscopic and Neuroscience to medical students. I also participate in teaching human anatomy to Physical Therapy and Physician Assistant students.

I teach Embryology to Graduate students. I participate in teaching Anatomy to 4th year medical students.

I direct and teach the head and Neck Course to ENT, Maxillo-facial and Dermatology Residents.

Residents. I estimate that >95% of my professional time is devoted to teaching and 5% to medical education research.

a) Direct Teaching Activities (these include lectures, small group teaching, supervision of research, clinical precepting, grand rounds, laboratory teaching, workshops, etc.)

Teaching Activities

Activity Number	Year(s) Taught (e.g. 2004-present)	Course/ Clerkship Title or description of activity	Teaching Methods (e.g. lecture, small group, bedside instruction)	Total teaching hours/yr for this activity	Level of Learner (eg, first year med student)	Number learners/year for each activity**
1	2003-present	HF&D	Laboratory dissection Small group Teaching Class wide reviews	191	First year medical students	260+
2	2003-present	PT 504	Lecture Laboratory dissection Small group Teaching Class wide reviews	112	First year doctoral PT students	52
3	2005-present	Arcadia PA	Lecture Laboratory dissection Small group Teaching Class wide reviews	*101	First year PA students	100
4	2013-present	PA Jefferson	Lecture Laboratory dissection Small group Teaching Class wide reviews	*101	First year PA students	35
5	2008-present	C615	Lecture	3	Biomedical Graduate Students	12
6	2008-present	Anat 414	Laboratory dissection	24	4 th year Medical students	24
7	2013-present	H&N Anatomy	Lecture Laboratory dissection	16	ENT Residents	8

8	2003-present	ID150 Neuroscience Laboratory	Laboratory Instructor	52	First year medical students	260+
9	2003-present	The Systems IDPT.105.01 Microscopic Anatomy	Lecture Laboratory	125	First year medical students	260+
Grand Total				624		491

** If there is a variable number of learners at an activity, provide an average number.

***CONCURRENT**

The learner assessment grid below provides evidence of the quality and impact of your teaching activities. Methods of learner assessment might include feedback from learners, evaluation of the activity by faculty peers and wherever possible, objective evidence that activity objectives were met (direct observation or testing of the learner). For the purposes of this portfolio, please summarize evaluative data. Supporting documentation or testimonial letters from faculty peers documenting teaching effectiveness may be included as an appendix.

Evaluation of Teaching Activities

Activity number (see teaching activities grid above)	Describe the process for evaluating your teaching Students End of Course Evaluations).	Provide summary evidence of your teaching effectiveness ? Use learner assessment data when available
1	<p>Culled from Course Evaluation HF&D 2015</p> <p>Students evaluation (I have lifted verbatim (Grid 222-241) comments provided by 1st year medical students at the end of HF&D 2015.</p> <p>Asked very helpful questions during dissection.</p> <p>I appreciated Dr. Ariyos comments on the clinical applications of our dissections when he was in our room.</p>	

	<p>Dr. Ariyo is ok in lab. He's a bit hard to understand at times. When my group would ask him a question, he would often go off on a tangent and never answer the question that we asked. He is a nice guy though.</p> <p>His questions are helpful as he walks around the lab.</p> <p>Did not have much experience with Dr. Ariyo.</p> <p>Sometimes in dissection his speeches were a little long winded so if he could cut down on the extrenuous information it would be better.</p> <p>Dr. Ariyo was always ready and willing to provide assistance in the dissecting room and often would teach us useful information about the structures we were dissecting.</p> <p>Also a nice person but not all that helpful in lab. Gave long winded answers that detracted from our ability to complete the dissections in a timely manner.</p> <p>Dr. Ariyo emphasized the clinical aspect of anatomy in the dissection. It was nice to make connections to what we were learning to the real world.</p> <p>Dr. Ariyo was great at clinical correlations but, in regards to structures with non-clinical connections, I found that he wasn't as knowledgeable .</p> <p>Dr. Ariyo was always very willing to help in the dissecting room and gave really great clinical applications that applied to what we were dissecting. Sometimes he would get stuck at a table for a long time and leave the rest of us to struggle, making certain lab periods frustrating.</p> <p>I like his reviews.</p>	
2	<p>Culled from Course Evaluation PT 503 2014</p> <p>Dr. Ariyo presents his material in a way to understand and makes sure to mention/emphasize the things he will ask on a test.</p> <p>Dr. Ariyo was great I learned a lot from his lectures Once I adjusted to the accent, learning from him was great. Perhaps have other review his test questions just to make sure they are consistent. hard time understanding him I understand there was a language barrier but he was very difficult to understand. He knew his material and when I could understand him it was great but when I couldn't I was really confused.</p> <p>My suggestion would be to put more words on the slide so it isn't all pictures and that way if we miss something he says then it is still written there</p> <p>Very difficult to understand, and sometimes his lecture slide formatting was confusing (especially the pictures). But once I got more used to his teaching style, I thought his lectures were very interesting and he easily kept me engaged during his lectures. He was very effective in stressing and highlighting main points, and relating them to physical therapy and practical clinical situations. See #15</p>	

b) Curriculum Design or Development

Activity Number (see teaching activities grid above)	Curriculum topic and type (e.g. clerkship module, residency longitudinal experience, fellowship research component)	Level and # of learners per yr	Has this curriculum been adopted by other institutions? (If yes, where)	Describe your contribution to the curriculum

Use the template below (optional) to demonstrate the quality of design and evaluation of each curriculum to which you have made major contributions. Duplicate the table as appropriate for each curriculum.

Activity Number	Indicators of Quality	Evidence of Quality
Goals/objectives	Goals are appropriate in scope; objectives are specific and measurable	
Learner needs assessment	Curriculum design uses learner needs assessment to choose and refine goals/objectives and methods; uses learner evaluative data to refine needs assessment	
Teaching/learning methods	Curriculum design includes variety of methods that address educational goals, and meet needs of diverse learners in specific educational settings	
Learner evaluation and feedback	Curriculum design includes sound learner evaluation methods (valid, reliable, feasible)	
Curriculum/program evaluation	Curriculum is modified periodically using results of learner and program evaluations	

c) Instructional Materials

List enduring materials that you have developed as an aid to your teaching activities (examples include web-based tools, instructional CDs or videos, instructional manuals, etc.)

A. Power point slide reviews on;

1. Back and Thorax
2. Abdomen, Pelvis and Perineum, plus Lower limb
3. Head and Neck and Upper limb.

B. Anatomical Variant Structures/Collections as teaching tools

II. Educational Administration/Committee Service

List memberships in Educational Committees (local, regional and national) and describe your role(s) in Educational Administration/Leadership. Where appropriate (ie, if you have a significant role such as committee chair, program director, course director), describe your accomplishments related to this role.

LEADERSHIP AND MEMBERSHIP ROLES				
Title of program/course(s) that you direct	Dept/ Instit'l	Regional	National/ Internat'l	Duration in years
Name of educational committee(s) that you lead				
Name of educational committee(s) on which you are a member				

Professional Reviewer/Moderator Activities related to Education at the National Level

Sponsoring journal, organization, institution, agency, etc	Year/s of review or moderating	What was reviewed/moderated (Grants, papers, abstracts)

III. Educational Scholarship

List contributions to Educational Scholarship in reference format. Include author(s), title, communication medium, peer group to which the material was presented and date. Indicate source and amount of funding for project support if applicable. Separate educational scholarship into: Publications, Presentations and Enduring Materials (CD-ROM, Monograph, etc). Briefly describe process for peer-review if not evident by format of dissemination.

Publications**Peer –Reviewed Medical Education Research Papers**

1.C.L. Mills, **O. Ariyo**, K. M. Yamada, J. W. Lash , and Ruth Bellairs Evidence for the involvement of receptors for fibronectin in the promotion of chick tail segmentation. Anat Embryol (1990) 182:425-434

2.**Ariyo O** (2015) . "A Segmental Hypoplastic Anterior Tibial Artery Coexisting with an Hypertrophied Perforating Fibular Artery. A Case Report and Clinical implications. Int.J.Morphol, 33(1): 19-23.

3 **Ariyo O** (2015) Coupled Multiple Musculo-Neurovascular Variants in the L Upper Limb and Clinical Implications Accepted by the Scientific Board for publication in International Journal of Morphology. Oct. 24.

Medical Education Abstracts:

1. **Ariyo O** and Shea JR (2013) Axillary Artery Bifurcation Accepted and published by European Association of Clinical Anatomists (EACA) Lisbon, Portugal June 2013

2. **Ariyo O** and Shea JR (2013) Ulnar-Median Nerve Transposition Accepted and published by European Association of Clinical Anatomists (EACA), Lisbon, Portugal June 2013

3. **Ariyo O** (2014) Bilateral but Dissimilar Brachioradial Artery. Morphology and Clinical Implications. British Association of Clinical Anatomists. Plymouth. July . 2014.

4 **Ariyo O** (2015). Aberrant Right Subclavian Artery Arising distal to Left Subclavian Artery and Its Clinical Implications. American Association of Clinical Anatomy. Salt-Lake City, UTAH, Regional Conference .

5. **Ariyo O**. Pictorial Essay on Variant Origins of the Vertebral Artery- Accepted for Oral presentation at the 2015 Winter Meeting of the British Association of Clinical Anatomy (BACA) London. Dec. 10th, 2015 **

6. **Ariyo O**. Lusoria Dysphagia and Kommerrel Syndrome Accepted for poster presentation at the 2015 Winter Meeting of the British Association of Clinical Anatomy (BACA) London. Dec. 10th, 2015

Presentations.

1. Branch –Out Speaker. Regional Meeting of the American Association of Clinical Anatomy Oct. 17th, 2015
Salt Lake City

2. Oral Presentation of Abstract- Winter Meeting of the British Association of Clinical Anatomy , London. Dec. 10th, 2015.

Abstract presented as a Branch Out Speaker (SLC, Utah. 10/17/2015

I have selected 2 Mentees with outstanding performances after mentoring and advising activities

Name and status of mentee or advisee	Dates of mentoring/ advising	Mentee's significant achievements* (2 Mentees chosen for significant improvements
Jessica Myers (Class of 2019).	Six different times during 2015 HF&D course approximately 1 hour/session, in office or laboratory dissection lab	Improved average scores in Practical Anatomy exams from a low 50's in the 1 st Practical ending with 74% and 84% in the 2 nd and Final exams
Asley Nguyen (Class of 2019)	Four different times during 2015 HF&D course approximately 1 hour/session, in office and laboratory dissection lab each	Dr. All! I hope your conference is going well! I'm happy with my performance on the final set of exams... Written 93.33% and Practical 88%! My overall average came out to like a 88.28% SO CLOSE! Yet so far away! I'll get them next time! :) Ashley Nguyen Sidney Kimmel Medical College Class of 2019 Ashley was referred because of low grade performance in 1 st HF&D Practical exams.
Britanny Charsar MD/PHD (Now in 3 rd Year of the program)	Collaboration in cleaning up specimens, photography of anatomical structures and research contribution from Journal articles search	(Co-author in a submitted Manuscript (A superficial brachioulnar artery coexisting with an absent Subscapular artery and its clinical implications" Paper returned with Editors comments to re-edit and resubmit} European Journal of Anatomy

* E.g., papers, awards, grants, promotions, leadership positions. Attach a list if needed.

V. Teaching Awards/Honors or Other Recognition for Educational Contributions

I was voted one of the top 3 for three consecutive years as an Instructor in Gross Anatomy at the University of Pennsylvania between 1987-1991

VI. Faculty Development

Name and Description (include duration, e.g. 3 hrs, 1 day, 1 month)	Dates and Location	Sponsoring organization/Institution
Junior Faculty Meetings	JAH,207	Dept. of Pathology Anatomy and Cell Biology
Departmental Educational Retreat 8 hours	19 th and Market July 22,2014	Dept. of Pathology, Anatomy and Cell Biology

VII. Reflective Statement

Provide a one paragraph statement of teaching philosophy and how you hope to impact medical and/or graduate education.

I have chosen medical education as a calling from the many opportunities that I have been blessed with in life and my teaching philosophy has always been premised on bringing values that are student – centered, dedicated to the teaching of core knowledge of anatomy, mentoring, providing guidance and sharing professional experience targeted at producing safer, more competent practitioners less likely to make mistakes and incur litigation in the future. I have constantly challenged myself to achieving greater proficiency in teaching relevant clinical anatomy to medical undergraduates as well as laying a good foundation in thorough knowledge of Anatomy that are helpful especially in post-graduate specialist and surgical training. As Jefferson embarks on a restructured future program in the training of future medical doctors, I see this as a paradigm shift that is expected to bring more of clinical relevance, models, IT revolution and radiographic images, computer-assisted learning and assimilation of core knowledge that requires of me flexibility, innovative thinking and imbibing technological adaptability despite its challenges. Jefferson and especially the vibrant, empowering, academic scholarly and learning friendly environment provided by the current leadership in the Department of Pathology, Anatomy and Cell Biology, most especially the innovative Junior Faculty Initiative meetings and interactive seminar presentations fostering collaborations and grooming for outside meetings demand that added values through innovative thinking are expected in return. With the changing format in the expected metamorphosis in the training of future doctors at SKMC, I will continue to incorporate devotion to studying and articulating clinical relevance to the teaching of core anatomy and through my collection of anatomical variants, combined with regular prosection sessions to 4th year medical students (Anat.414), where concepts of “reconstruction and deconstruction” are emphasized, these will be helpful in teaching advanced anatomy to medical students as they are expected to return to learning more advanced anatomy relevant to their speciality areas. To this end I have in my collection various anatomical vascular variants including but not limited to supra-aortic branching patterns, renal aberrants including bifid ureters and pelvic kidneys as well as numerous upper and lower limb neurovascular variants, hoping to harvest more collections of anatomical structures so that future Jefferson doctors are well trained and better prepared for a future professional practice that is more safe, providing patient safety and satisfaction and fewer litigious surgical malpractice as they go into the world as future worthy ambassadors of an academic medical educational center that prides itself with the vision of “reimaging health, health education and discovery to create unparalleled value and to be the most trusted healthcare partner”

“reimaging health.....” Culled from Jefferson University and Hospitals vision statement”.

EXHIBIT 39

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

OLUTAYO ARIYO

Plaintiff,

vs.

THOMAS JEFFERSON UNIVERSITY
MEDICAL COLLEGE

Defendant.

CIVIL ACTION

No. 2:23-cv-02835-NIQA

DECLARATION OF KAREN NOVIELLI, M.D.

Now comes, Karen D. Novielli, M.D., who, being first duly sworn according to law, deposes and states the following:

1. I, Karen D. Novielli, M.D., am over eighteen (18) years of age, am not under any restraint or disability, and am competent to testify to the matters stated herein. I was born on September 6, 1961.

2. I am employed by Thomas Jefferson University (“TJU” or the “University”) in Philadelphia County, Pennsylvania, as the Senior Vice Provost for Faculty Affairs and Professional Development. I also serve as the Vice Dean for Faculty Affairs and Professional Development of the Sidney Kimmel Medical College of Thomas Jefferson University.

3. I have been employed by TJU since 1987 and in administrative roles within faculty affairs/faculty development since approximately 2002.

4. As TJU’s Senior Vice Provost for Faculty Affairs and Professional Development, I oversee the faculty related programs, processes and policies, including those pertaining to faculty recruitment, tenure, promotion, and faculty governance. I also oversee TJU’s various programs

and initiatives aimed at fostering faculty growth, including professional development, leadership training, and teaching excellence.

5. Specifically, I monitor and verify whether employees meet the minimum objective qualifications to be considered for promotion by Committee.

6. Decisions concerning academic promotion and tenure are made based on evaluations of faculty in multiple areas including their contributions to education, scholarship and internal and external service. Documents considered include, but are not limited to, student evaluations, supervisor recommendations, peer-faculty evaluations, and TJU policies and standards.

7. In my capacity as Senior Vice Provost and Vice Dean, I became familiar with Dr. Olutayo Ariyo's career advancement at TJU because, as noted above, I am responsible for verifying that faculty under consideration for promotion fulfill their respective college's established minimum criteria, as amended from time to time.

8. Dr. Ariyo was on TJU's Clinical Educator Track. This "track" includes prefixed,¹ non-tenured faculty appointments. Upon his retirement, he held the title of Clinical Assistant Professor. Had he met the criteria for advancement, the trajectory would have included promotions to Clinical Associate Professor and, ultimately, Clinical Professor.

9. Dr. Ariyo was first hired in 1995 as a part time Post-Doc Fellow Training, temporarily assigned to the Department of Anatomy and Pathology. In 1996 he was rehired as a Post-Doc Fellow Train/Taxed, again in the Department of Anatomy and Pathology. Dr. Ariyo was subsequently hired as a full-time Research Assistant in the Department of Anatomy and Pathology

¹ TJU provides both unprefix and prefixed tracks. The unprefix tracks for faculty appointments necessitate promotion and tenure within defined time frames. In contrast, prefixed tracks allow greater flexibility in advancement timing as they do not require milestone achievements within specific periods. Faculty on prefixed tracks are not subject to the maximum time in rank and may be reviewed for promotion per the specific track's policies and procedures. The time in rank for prefixed tracks is as follows: (1) minimum one year as an Instructor before consideration of a promotion to Assistant; (2) minimum four years as an Assistant Professor before consideration for a promotion to Associate; (3) minimum five years as an Associate Professor before consideration for a promotion to Clinical Professor.

in 2004. In this role, he assisted with laboratory work but was limited in other components, such as lecturing and teaching activities.

10. In June 2013, Dr. Ariyo was promoted to a faculty position as Clinical Instructor of Pathology, Anatomy, and Cell Biology at Sidney Kimmel Medical College. He lectured students and guided small-group laboratory sessions in this role, primarily in dissection work.

11. On June 19, 2018, Dr. Ariyo was promoted to Clinical Assistant Professor of Pathology, Anatomy, and Cell Biology.

12. He remained a Clinical Assistant Professor until his retirement on June 30, 2022.

13. I met with Dr. Ariyo throughout his career to discuss the necessary qualifications for advancement within the Clinician Educator Track². During these meetings, I informed Dr. Ariyo that the colleges of TJU establish the requirements, evidence of achievement, and criteria for faculty advancement, subject to the approval of the Provost. General considerations for faculty promotions include scholarship, letters of recommendation from other faculty members, and an employee's overall service to TJU and the profession. Such requirements or evidence of achievement needed for employees in the Clinical Educator Track are reflected in TJU's Faculty Handbook, attached hereto as Exhibit 32.

14. Service to TJU includes an employee's effectiveness as a teacher, professionalism, and commitment to bettering TJU.

15. Effectiveness as a teacher is the most important factor considered for faculty promotion within the Clinician Educator Track, from the instructor to the assistant professor rank. Effectiveness of teaching can be evidenced by (1) a summary of resident, fellow, and/or student evaluations from recent years or (2) a letter from the appropriate educational leader addressing the

² TJU provides both un-prefixed and prefixed tracks. The un-prefixed tracks for faculty appointments necessitate promotion and tenure within defined time frames. In contrast, prefixed tracks allow for greater flexibility in advancement timing as they do not require milestone achievements within specific periods.

proposed faculty member's effectiveness in teaching. An educator who meets the minimum requirements to be eligible for promotion will not necessarily be promoted if their effectiveness as a teacher does not warrant promotion.

16. I am aware that Dr. Ariyo received unfavorable student evaluations as a Research Associate and Clinical Instructor. Students frequently reported that Dr. Ariyo had poor communication skills, often spent too much time focusing on irrelevant material, contradicted himself in lectures, had poor time management, failed to spend adequate time visiting with every laboratory group during dissections, would take over dissection practice work from students, and had difficulty answering student questions directly. *See Exhibit 29.*

17. Several of Dr. Ariyo's colleagues expressed concerns similar to those of the students, in addition to concerns regarding Dr. Ariyo's reliability, responsiveness, and work product. By way of example, Dr. Ariyo was removed from a teaching assignment because he failed to demonstrate the technological knowledge necessary to conduct the class. *See Exhibits 1-3 and 28.* In addition, I became aware of several instances where faculty expressed frustration about Dr. Ariyo's lack of responsiveness in developing course materials. *See Exhibits 14-27.*

18. In addition to the aforementioned issues, to be promoted to Clinical Associate Professor, one must have served as a Clinical Assistant Professor for a minimum of four (4) years. As of 2020, Dr. Ariyo fell short of this requirement, having only served as a Clinical Assistant Professor for a maximum of two (2) years. It is also crucial to understand that meeting the time-in-rank requirement does not ensure promotion; it is merely a prerequisite to be eligible for consideration for promotion in rank.

19. I am aware that on September 7, 2021, Dr. Ariyo communicated his intent to retire from TJU in June 2022. *See Exhibits 10 & 11.*

20. On September 15, 2021, Dr. Ariyo submitted his official retirement notice in writing, effective June 30, 2022. In his letter, he thanked his Department and TJU for “all the opportunities...” *See* Exhibit 4.

21. I am aware that months after he submitted his retirement notice, he expressed his desire to participate in TJU’s Phased Retirement Program.

22. TJU’s Phased Retirement Program is designed for faculty nearing retirement, allowing them to gradually reduce their commitments in teaching, research, or clinical care, provided they meet specific eligibility requirements and agree to terms acceptable to the department and college.

23. In March 2022, Dr. Ariyo communicated his intention to join the Phased Retirement Program, with plans to maintain his teaching role until 2024. *See* Exhibit 9.

24. TJU rejected his request because, relying on his retirement notice in September, we had already dedicated resources to finding a replacement in response to his notice, leading to the redistribution of his salary budget across multiple positions.

25. On or about June 19, 2022, eleven days before his retirement, Dr. Ariyo completed the minimum four years needed as Clinical Assistant Professor to be considered for promotion to Clinical Associate Professor.

26. On or about June 21, 2022, nine days before his retirement, Dr. Ariyo sought consideration for promotion to include backpay.³ *See* Exhibit 31.

³ Promotion to Assistant or Associate Professor depends on a mix of professional growth, experience, and the fulfillment of the department’s specific criteria. A minimum duration in rank is mandatory for promotion. For the applicable tracks, one must serve at least four years as an Assistant Professor and a minimum of five years as an Associate Professor. Dr. Ariyo was required to work for four years as a Clinical Assistant Professor to satisfy the prerequisite qualifications in time and rank for consideration for the role of Clinical Associate Professor, followed by an additional five years to be eligible for Clinical Professor.

27. I shared my concerns with Dr. Ariyo about whether he meets the criteria for promotion to Associate Professor, particularly his ability to show excellence in teaching, which is part of my duty as Dean.

28. I also shared with Dr. Ariyo that, despite my reservations, I was willing to submit his promotional application for consideration. However, it would still need to proceed through TJU's promotional process and require Committee approval.

29. Finally, I shared that if the promotion is approved, given the timing of the promotion and pending retirement, any change will be in title only, as his retirement will take effect before promotions do on July 1.

30. It is highly unusual and not I my usual practice to submit a promotion application while the applicant's retirement is pending. I made this exception out of courtesy, as the promotion would merely alter his title. His retirement became effective on June 30, 2022, prior to any pay adjustments related to promotions that took effect on or after July 1, 2022, at TJU.

31. I never considered submitting a promotional application for the position of Clinical Professor because Dr. Ariyo did not meet the minimum qualifications of time in rank for the preceding position of Associate Professor.

32. I have not, nor has TJU discriminated against Dr. Ariyo due to his race, national origin, or other prohibited factors.

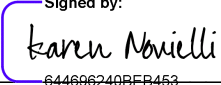
33. During my employment with TJU, my decisions on employment actions and/or employment recommendations have been guided by my understanding of the provisions of the relevant faculty handbook and state and federal law. All my decisions have and will continue to be made without regard to race, national origin, sex, gender, disability, age, or any other prohibited factor.

34. Dr. Ariyo's promotions were based on TJU's criteria, which include both objective and subjective factors. TJU does not make employment decisions based on race or national origin, and it did not make any employment decisions regarding Dr. Ariyo based on his race or national origin.

35. The information in this declaration is based on my personal knowledge. This declaration is provided regarding *Olutayo Ariyo v. Thomas Jefferson University Medical College*, United States District Court for the Eastern District of Pennsylvania, Case No. 2:23-cv-02835-NIQA.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct.

Date: 5/5/2025

Signed by:

644696240BEB453...
KAREN NOVELLI, M.D